



 **Compliance Group**  
**Equality and Diversity Policy**

**Electrical**

**Fire**

**Water**

Website: [compliancegroup.uk](http://compliancegroup.uk) | Email: [info@compliancegroup.uk](mailto:info@compliancegroup.uk) | Telephone: +44 (0) 204 5518729

Compliance Group Limited is registered in England and Wales with company number 12351374 and registered address at 85 Great Portland Street, London, England, W1W 7LT

## Approval

The signatures below verify that this policy has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Position	Date
Prepared by	Phillipa Clark	HR Advisor	30/06/2023
Approved by	Cally Hickman	Group HR Director	30/06/2023

## Amendment Record

This policy is reviewed to ensure its continuing relevance to the systems and process that it describes.

Revision	Document Reference	Changes made	Date
0	Whole document	New document. Document issued at Rev 0.	29/06/2023

The electronic version of this policy is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version(s) of this document is uncontrolled.

## 1. Introduction

Compliance Group Limited is committed to developing, maintaining and supporting a culture of equality and diversity in which all employees are treated equitably and have the opportunity to contribute to their full potential.

CGL aims to ensure that employees are selected, trained, remunerated, promoted and transferred solely on the basis of their merits, abilities and potential.

This policy and procedure applies to all colleagues, agency workers and contractors, irrespective of your pattern of hours or length of contract.

Any questions relating to the interpretation of this policy and procedure should be directed to the HR department the first instance.

## 2. Scope

This policy applies to all Compliance Group colleagues across all sites, subsidiaries and field-based colleagues. This policy and procedure are not contractual and the Company reserves the right to amend the policy and procedure should it, in its sole discretion, elect to do so.

## 3. Policy

CGL is committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment, against its clients or other third parties.

The Company or its representatives will not discriminate unlawfully against its clients seeking to use facilities or services of the Company.

The Company is also committed to complying with relevant equality legislation and associated codes of practice. No employee will be treated less favourably than another because of their membership of a protected group. Protected groups are those which are defined as in relation to the following characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including ethnic or National origins, Nationality or Colour)
- religion or belief
- sex
- sexual orientation

These characteristics are referred to as Protected Characteristics.

## 4. Principles

You are responsible for the promotion and advancement of this policy. CGL expects you to treat all employees, contractors and clients or other guests with respect, courtesy and consideration; attitudes or behaviour that amounts to direct discrimination, associative discrimination, discrimination by perception, indirect discrimination, harassment (including harassment by a third party), victimisation and bullying will not be tolerated.

Behaviour or actions that transgress this policy and procedure will be dealt with in accordance with the Company's Disciplinary Policy and Procedure.

You should be aware that you can be personally liable as well as the Company, for any act of unlawful discrimination. Should you commit serious acts of harassment you may be guilty of a criminal offence.

## 5. Complaints of Discrimination

The Company takes all claims of discrimination very seriously and will take appropriate action against those concerned. If you consider that you have experienced (or have witnessed) unlawful discrimination, harassment or victimisation as a result of a Protected Characteristic, you may make a formal complaint in one of the following ways:

If you have witnessed bullying or harassment then you should follow the procedures outlined in the Bullying & Harassment Policy and Procedure.

If you have witnessed any discrimination that falls outside of the scope of the Bullying & Harassment Policy you should raise your complaint using the procedures detailed in the Grievance Policy and Procedure.

If a worker (engaged through or by an employment agency) considers they have been discriminated against they should raise their complaint with their employer.

The following examples of potential discrimination are provided in order to demonstrate how the Company would respond to these issues. The list of examples below is not exhaustive:

### 5.1 Gender

The Company encourages women and men in ensuring that they are fully and properly represented at all levels of the organisation by supporting employees in balancing their life at work and at home. Applications for flexible working will be considered and the process for this is outlined in the Family Friendly and time off Policy.

### 5.2 Trans-Gender Status

Colleagues who plan to undergo, are undergoing, or have undergone gender re-assignment are protected against all forms of discrimination and harassment. The Company will take positive steps to support trans-gender colleagues and ensure they are treated with dignity and respect.

It is unlawful to treat someone less favourably than other colleagues in relation to employment or vocational training on grounds that they proposed to, starts or has completed a process to change their gender. It is no longer necessary for an individual to have undergone a medical procedure to be legally protected, so it is sufficient if they decide to live as a member of the opposite sex but does not undergo medical procedures. Bullying or harassment on grounds of gender reassignment is unlawful discrimination.

The Company will be supportive of you should you express an intention to undergo gender reassignment and will work with you to try to ensure as smooth a transition at work as possible. This will include practical considerations such as time off for treatment, access to counselling, communicating the change to colleagues and agreeing the point at which they may wish to use any single sex facilities, such as toilets in your new gender etc.

## 6. Types of unlawful behaviour

### 6.1 Protected Characteristics

It is unlawful to discriminate directly or indirectly because of a Protected Characteristic.

### 6.2 Types of unlawful discrimination

Unless there is specific legal exemption, the following types of discrimination are generally prohibited by law in the United Kingdom:

#### 6.2.1 Direct Discrimination

Direct discrimination occurs where a person is treated less favourably than another because of a Protected Characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

### 6.2.2 Indirect Discrimination

Indirect discrimination describes the situation where an unjustified provision, criterion or practice has the effect of disadvantaging people who share certain Protected Characteristics. An example of indirect discrimination may be a minimum height requirement for a job where height is not relevant to carry out the role. Such a requirement would likely discriminate disproportionately against some women and some minority ethnic groups. Indirect discrimination may be justified if it can be shown that the provision, criterion or practice is a proportionate means of achieving a legitimate aim.

### 6.2.3 Associative Discrimination

Associative discrimination refers to direct discrimination against someone because of their association with someone who has a Protected Characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity). For example, where an employee is treated less favourably because of their brother's sexual orientation.

### 6.2.4 Perceptive discrimination

Perceptive discrimination refers to direct discrimination against someone because they are incorrectly perceived by others to have a Protected Characteristic (other than marriage and civil partnership and pregnancy and maternity). This could occur for example if an employer does not promote an employee because they believe he or she has a disability.

### 6.2.5 Harassment

Harassment may also occur where a person engages in unwanted conduct towards another because he/she perceives that the recipient has a Protected Characteristic (for example, a perception that he or she is homosexual or disabled). Similarly, harassment could take place where an individual is bullied or harassed because of another person with whom the individual is connected or associated, for example if his/her child is disabled, partner is pregnant or friend is a devout Christian.

Harassment also includes circumstances where an individual is subjected to unwanted conduct from a third party, such as a client or customer. For example, it may be that a client makes a series of racist remarks to an employee.

Harassment is unwanted conduct, related to a Protected Characteristic, that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

### 6.2.6 Third Party Harassment

The law protecting employees from harassment has been extended to cover situations where an employee, as a result of a Protected Characteristic, is harassed by someone who is not an employee of the Company. Examples of third parties include contractors. The employer will become legally responsible if they know an employee has been harassed on two or more occasions and fails to take reasonable steps to protect the employee from further harassment.

### 6.2.7 Failure to make reasonable adjustments

This occurs where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that Protected Characteristic and the employer has failed to make a reasonable adjustment to enable the disabled person to overcome the disadvantage. It is unlawful to treat someone less favourably because of a disability or to fail to make reasonable adjustments.

### 6.2.8 Victamisation

It is unlawful to victimise someone because they assert their legal rights in line with the Equality Act 2010 or has supported someone else who has made a complaint or given evidence in relation to a complaint or any other proceeding, unless it can be demonstrated that the individual acted maliciously or made or supported an untrue complaint. Victimization may occur if, for example, a manager behaves in a hostile manner to an employee who supported a colleague in submitting a formal complaint against the manager for sexist behaviour.

## 7. Vicarious Liability

UK law makes the Company vicariously liable for negligent acts or omissions by employees in the course of employment, whether or not such an act or omission was specifically authorised by the employer. In other words, the Company is strictly liable for the wrongdoing of its employees unless it can be demonstrated that all reasonable steps were taken to prevent the discrimination or harassment occurring or that the employee was acting on his or her own volition.



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