

Equality, Diversity and Inclusion PolicyNovember 2023

Responsible	Equality, Diversity, and Inclusion Team		
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1. Purpose and scope

- 1.1 CPL Group is an equal opportunities employer. The Group aspires to create a diverse working environment and culture where employees of all different backgrounds are able to contribute at their highest level and where differences have a positive impact by creating practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no person receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation (as detailed in the Equality Act 2010) or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.
- 1.2 The terms equality, inclusion and diversity (EDI) are at the heart of this policy. 'Equality' means ensuring every employee has the same opportunities to fulfil their potential free from discrimination. 'Diversity' means the celebration of individual differences amongst the workforce. 'Inclusion' means ensuring every employee feels comfortable to be themselves at work and feels the worth of their contribution. The Group actively supports equality, diversity and inclusion and will ensure that all employees are treated with dignity and respect. The Group wants to encourage everyone to reach their potential.

1.3 The Group aims to:

- Prevent discrimination, eliminate prejudice, promote inclusion, and celebrate diversity within the organisation.
- Be fair in its dealings with all people Board of Trustees, Group Leadership Team, employees, potential candidates, customers, and members – with whom it has relationships taking into account the diverse nature of their culture and background.
- Ensure that EDI is embedded in everything it does through the EDI Strategy.
- 1.4 The policy is applicable to all current and potential employees, part-time and full-time employees, casual workers, suppliers, customers, and members of and visiting the Group, whether permanent or temporary.

2. Responsibilities

2.1 All employees are responsible for the promotion and advancement of this policy, helping create a work environment that is free from harassment and bullying. Managers must set an appropriate standard of behaviour utilising the CPL Group Code of Conduct policy, lead by example and ensure that those they manage adhere to the policy and promote

















the aims and objectives with regards to EDI. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

- 2.2 The EDI Working Group have a particular responsibility for implementing and monitoring the EDI policy and, as part of this process, all policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.
- 2.3 All employees will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Group.
- 2.4 While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of everyone to this policy and application of its principles are essential to eliminate discrimination and provide equality and equity throughout the Group.

3. Our commitment as an employer

- 3.1 The Group is committed to:
 - Creating an environment in which individual differences and the contributions from employees are recognised and valued.
 - Ensuring that every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
 - Providing training, development, and progression opportunities to all employees.
 - Reviewing all employment practices and procedures to ensure fairness and inclusion for all.
 - Taking steps to ensure equity amongst employees. Such as ensuring that
 vacancies are advertised to a diverse range of potential candidates and, where
 relevant, to groups that have been identified as disadvantaged or
 underrepresented. Taking positive action to recruit disabled people and ensuring
 there are no unlawful barriers to accessing employment opportunities, training,
 progression opportunities, benefits and facilities.
 - Diversity amongst employees with regular monitoring to ensure equal opportunities throughout the Group. Where appropriate, measures will be taken















to identify and remove unnecessary obstacles and to meet the special needs of disadvantaged or underrepresented groups.

- Meeting the priorities as listed within the EDI Strategy Plan, delivering the strategy by actioning each initiative.
- Putting in place a working group that have the appropriate resources to deliver the EDI priorities.
- Monitoring and reviewing the policy and strategy annually.

4. Our commitment as a service provider

- 4.1 The Group is committed to:
 - Providing services to which all customers and members are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
 - Making sure its services are delivered equally and meet the diverse needs of its customers and members.
 - Taking steps to ensure equity amongst its members and clients, such as removing any unlawful obstacles to accessing its services or facilities.
 - · Monitoring and reviewing this policy annually.
 - Having clear procedures that enable its members, customers, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.

5. Breach of policy

- 5.1 Behaviour, actions, or words that transgress this policy will not be tolerated and will be dealt with in line with the Group's Disciplinary Procedure. If an employee witnesses, or is subject to, harassment, behaviour, actions, or words in breach of this policy, they should inform their line manager if appropriate, or alternatively they should contact People Development.
- 5.2 If an employee wishes to raise a grievance, they should follow the Grievance Procedure. Use of the Group's Grievance Procedure or Disciplinary Policy does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.















6. Data protection

6.1 The Group will process any personal data collected in accordance with the Group's Data Protection Policy. Data collected from the point at which the employee makes the report is held securely and accessed by, and disclosed to, employees only for the purposes of dealing with the disclosure.

7. Failure to comply

7.1 Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence. If misconduct is discovered as a result of any investigation under this procedure, the Group's disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is also a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to the Managing Director or People Development.

8. Equality, diversity and inclusion

8.1 CPL Group is an equal opportunity employer. This is not only a legal requirement underpinned by the Equality Act 2010 but is also a commitment from the Group. As an employer, the Group embraces equality, diversity and inclusion (EDI) and seeks to ensure that its policies are free from unlawful or unfair discrimination and underpin the Group's values.













