

Equality, Diversity & Inclusion

Policy statement

Practicus (“Company”) does not tolerate discrimination in our business and is committed to equality, diversity and inclusion among our workforce, customers and supply chains. The aim is for the Company’s workforce, and those in our wider business dealings, to be truly representative of all sections of society where diverse perspectives are valued.

The Company is committed to creating an environment where everyone is treated with fairness, dignity and respect, and we aim to build an inclusive culture where everyone feels valued, able to contribute fully and supported to succeed.

To be clear, this policy applies to all individuals working for the Company or on the Company’s behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors or consultants.

This policy is supported by our internal EDI Policy, and can be read in conjunction with the Company’s Anti-Harassment & Bullying Policy.

1. Responsibility for the policy

- 1.1 The Board of Directors has overall responsibility for ensuring that this policy complies with the Company’s legal and ethical obligations, and that it is implemented effectively.
- 1.2 The Head of Business Support and Head of People have day-to-day responsibility for implementing this policy, monitoring and reviewing internal controls and related policies and procedures to ensure they are effective. They are also responsible for investigating allegations of wrongdoing that contradict this policy.
- 1.3 Line managers are responsible for ensuring team awareness and compliance with the policy, and escalating concerns promptly.
- 1.4 Everyone is responsible for remaining vigilant to discrimination and has a duty to act. We encourage direct challenge where you feel comfortable but please also report concerns promptly.

2. Commitments

2.1 The Company commits to:

- Not unlawfully discriminate, as defined by the Equality Act, against the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation
- Fair treatment for all. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or any other developmental opportunities.
- Create an environment free of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, contractors, suppliers, visitors or any others.
- Listen and take seriously complaints of such behaviour.
- Monitor diversity. The Company monitors the make-up of its own workforce and, as a

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recruitment provider, it surveys and produces statistics on the individuals it places with its clients.

3. Definitions

3.1 The Equality Act 2010 identifies different forms of discrimination.

- **direct discrimination** – where someone is treated less favourably than another person because of a protected characteristic.
- **indirect discrimination** – when a rule or policy applies to everyone but disadvantages a person with a protected characteristic.
- **harassment** – this is behaviour that creates an intimidating and hostile environment in relation to a protected characteristic. Employees can complain of behaviour they find offensive even if it is not directed at them.
- **victimisation** – this occurs when someone is subject to a detriment because they have made or supported a complaint or grievance under the Equality Act 2010.

4. Breach of policy

4.1 All staff understand they, and the Company, can be held liable for behaviour and acts that breach this policy and, as such, these situations will be dealt with as misconduct under the Company's grievance and/or disciplinary procedure, up to and including immediate dismissal. It is further understood that particularly serious complaints may be referred to the police or relevant authorities, such as sexual assault allegations or harassment related to a protected characteristic as per the Protection from Harassment Act 1997.

5. Recruitment, advertising, and selection

5.1 The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. The Company is committed to applying its EDI policy at all stages of recruitment and selection.

5.2 Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, to attract applications from all sections of the community, the Company will, as far as reasonably practicable:

- a) ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
- b) avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

5.3 Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

5.4 However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Company will apply that requirement to the job role, and this may therefore be specified in the advertisement.

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- 5.5 The selection process will be conducted consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new employees will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.
- 5.6 With disabled job applicants, and indeed our disabled employees, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.
- 5.7 If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

6. Terms of employment, benefits, facilities, services and pay

- 6.1 The Company is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out like for like work, work rated as equivalent under a job evaluation study or work of equal value. To achieve this, the Company will endeavour to maintain a pay system that is fair and transparent, free from gender bias and based on objective criteria.
- 6.2 Where it is legally obliged to do so, the Company will also prepare and publish an annual gender pay gap report in accordance with statutory requirements from time to time in force.
- 6.3 All terms of employment, benefits, facilities, and services will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

7. Training and awareness

- 7.1 The Company will train all line managers in the Company's policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices. Line managers will be responsible for ensuring they actively promote equality of opportunity within the departments for which they are responsible.
- 7.2 The Company will also provide training to all employees to help them understand their rights and responsibilities in relation to equal opportunities and what they can do to create a work environment that is free from discrimination. This extends to the services the Company provides to its customers.
- 7.3 The policy is available on the Company website and is shared with all suppliers, contractors

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and other business partners when entering into new or renewed contracts with them.

8. Reporting concerns and complaints

- 8.1 Concerns and complaints can be raised with a line manager, a member of the SLT or Board, or via the Company's whistleblowing policy or grievance procedure.
- 8.2 All concerns and complaints will be treated with strict confidence and taken seriously.
- 8.3 The Company will not tolerate any retaliation against individuals who raise concerns in good faith.
- 8.4 External guidance is available from <https://www.acas.org.uk/> and <https://www.citizensadvice.org.uk/>

Signed:



Sam Hawkins
CEO
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