

# Inclusion and Diversity Policy

## Introduction

At XPS our vision is to create a vibrant place to work where difference is recognised as a strength and where talented people can flourish and achieve their highest potential. We recognise the value that diverse perspectives, experiences, and skillsets bring to the workplace.

As an employer, XPS Group has a responsibility to eliminate unlawful and unfair discrimination and fulfil our legal obligations. But our commitment stretches beyond this. We look to foster a culture of belonging, where employees feel that their ideas and contributions are valued.

## This policy underlines the commitment of XPS Group to meet these obligations and celebrate our diversity

- To promote a diverse and inclusive culture with zero tolerance for unfair and unlawful discrimination within XPS Group.
- To clearly communicate our Inclusion & Diversity commitments to everyone who works for or with XPS Group, and to ensure that they understand the supporting policies and processes should they wish to raise an issue or concern.

## Who does this policy cover?

Existing and prospective employees of XPS Group including those on fixed-term contracts, agency workers and self-employed contractors. XPS Group also values stakeholder diversity and, as such, works to develop strong and sustainable relationships with our diverse range of stakeholders including communities, employees, governments, clients and suppliers.

## Our commitment

- To provide an environment free from discrimination, harassment, bullying or victimisation of any kind.
- To treat all prospective and existing employees fairly and with respect.
- To foster innovation and further strengthen our market position and employee relations.
- To investigate and take appropriate action, such as disciplinary action, regarding any behaviour resulting in unfavourable treatment.
- To monitor the composition of the workforce in meeting the aims and commitments set out in this policy.
- To ensure that decisions on recruitment, selection, training, promotion, career development, performance management, reward and redundancy are based solely on objective and job-related criteria e.g. experience, knowledge, and skills.
- To comply with our statutory responsibilities.

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## Roles and responsibilities

### Employees are responsible for:

- Respecting and acting in accordance with the spirit of this policy.
- Reporting the receipt of or observing any unacceptable behaviour and taking action on behalf of their colleagues where appropriate. This includes bullying or harassment by clients, suppliers, visitors, or others to their line manager. Please refer to the [Bullying and Harassment Prevention policy](#) for further support and guidance.
- Being aware that they would be personally accountable under law for any discriminatory action undertaken on their part.
- Co-operating with any measures introduced to develop equal opportunities e.g. participating in survey completion and feedback circles.
- Refraining from any kind of discriminatory action or decisions, including any type of harassment or abuse.

### Line managers or equivalent are responsible for:

- Respecting and acting in accordance with the spirit of this policy.
- Acting as role models and setting an appropriate standard of behaviour.
- Leading by example and ensure that they and those they manage or supervise behave in a way that supports and promotes XPS Groups' Inclusion & Diversity commitments.
- Ensuring that people related decisions are fair, objective and based on merit.
- Ensuring that neither they, nor their direct reports for whom they are responsible, and any other colleagues are subject to discrimination.
- Communicating to their team the importance of including everyone and the consequences of any unacceptable behaviour and challenging behaviour that falls short of our commitment to Inclusion & Diversity.
- Being aware of employees' behaviour and acting immediately on all complaints.
- Being sensitive to the concerns of their staff.

### HR is responsible for:

- Ensuring complaints are dealt with promptly and wherever possible, confidentially.
- Supporting line managers and employees with any issues relating to this policy.
- Acting as a confidential point of contact for line manager and employees.

## Relevant Legislation

Under the Equality Act of 2010 we have an obligation to eliminate discrimination and other prohibited conduct, advance equality of opportunity, and foster good relations between different groups. In Northern Ireland, the Fair Employment Regulations complement the Equality Act by specifically addressing discrimination on the grounds of religious belief.

Together, these legislative frameworks form the cornerstone of anti-discrimination and equality law in the UK, promoting a fairer and more equitable society.

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## What is Discrimination?

It is unlawful to discriminate against someone because they possess one of the 'protected characteristics' named in the Equality Act 2010. These characteristics are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Discrimination, harassment and victimisation on the basis of protected characteristics can take various forms.

### Types of discrimination:

- Direct discrimination occurs when a person is treated less favourably because of a protected characteristic. Direct discrimination can include discrimination because of association with an individual with a protected characteristic, and discrimination because of perception that an individual has a protected characteristic.
- Indirect discrimination can occur when a provision, criterion or practice is applied equally to all people, but adversely affects people with a particular characteristic, and where the requirement or condition cannot be justified.
- Dual discrimination can occur when a person is treated less favourably on the basis of having two or more protected characteristics.
- Disability Discrimination occurs when a person is treated less favourably on the grounds of their disability (direct discrimination) or when a provision, criterion or practice that applies to everyone particularly disadvantages those with disabilities (indirect discrimination). There is also a legal 'duty to make reasonable adjustments' so that disabled people can access jobs. Disabled people can experience discrimination if an employer or organisation doesn't make a reasonable adjustment.

[For further guidance and support, please refer to the Workplace Adjustment policy.](#)

### Types of harassment:

Harassment is unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

- Sexual harassment is unwanted conduct, which is offensive to the recipient, causing them to feel threatened, humiliated, patronised or harassed as a result of their sex.
- Racial harassment is behaviour which causes the recipient to feel threatened, disadvantaged or the subject of abuse because of their colour, race, nationality or ethnic origins.
- Third party harassment occurs where an employee is harassed by a third party e.g. a client, and the harassment is related to a protected characteristic.

[For further details on harassment please refer to the Bullying and Harassment Prevention Policy.](#)

### Victimisation:

- Victimisation relates to retaliation against an individual who has raised a complaint, or who has supported someone else's complaint of discrimination or harassment. It is unlawful to discourage or prevent people from complaining under the Acts.

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## How this policy applies to Recruitment and Selection

Equal opportunities should be applied throughout the recruitment and selection process and guidance is available to managers through the [Recruitment and Selection policy](#), Interview, Job Description and Shortlisting guides available from the Recruitment team. Our Equality & Diversity statement is available on the Company web site.

The following is a set of guidelines to assist line managers through this process:

- All Company vacancies are advertised internally in order that all employees have an opportunity to apply unless there is a sensitivity around the role.
- All advertisements should be organised in conjunction with the Recruitment team, not only to ensure the correct Company format is used, but to also ensure that the advertisement is not discriminatory.
- External agencies on the [Preferred Supplier List](#) (PSL) have been made aware that the Company is an equal opportunities employer. If there is a need for an agency outside the PSL to be used, you will need to discuss this with the recruitment team before placing the vacancy, to ensure the appropriate diligence checks take place and information regarding our approach to equal opportunities is provided.
- All colleagues involved in recruitment and selection should have attended XPS recruitment training, including the necessary legal and procedural requirements covered in the form of workshops, videos or guides. The current interview training programme/ guide highlights the correct procedures to adopt to ensure consistency, fairness and equality of opportunity.
- Application forms and processes for selection provided by the Recruitment team must be used during the process. The selection criteria should be set at the outset of the recruitment process, to ensure that the information gathered is objective, relevant and justifiable in the context for which it should be used. Completion of the online shortlisting form is essential to be able to demonstrate that selection decisions are fair and based on role criteria.
- As a Disability Confident Employer, we have committed to support all disabled applicants throughout the recruitment process, ensuring each stage of the recruitment process is inclusive and offers reasonable adjustments where required. We advertise all our roles on Evenbreak, the specialist job board for disabled candidates. Evenbreak can provide help and advice to disabled candidates who may be interested in our vacancies.

## How this policy applies to Learning, Development and Performance Management?

Learning, Development and Performance Management are areas where it is essential to have good inclusive practices. The following are guidelines for line managers:

- Performance Reviews should be completed by analysing job performance and relevant criteria to avoid subjective assessment.
- Length of service and other service-related criteria should not be used as criteria for assessing promotion. Decisions should be made on ability and skill.
- All employees should have equal access to and be encouraged to take advantage of training and development opportunities, where appropriate. For instance, part-time staff should receive equal opportunity to participate in training as their full-time counterparts.

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## How this policy applied to the XPS Group Disciplinary and Grievance procedures?

All colleagues may use the grievance, bullying and harassment procedures to complain about any kind of discriminatory conduct. The Company is keen to ensure that staff feel able to raise such grievances and individuals will not be penalised for raising a grievance in this area. Disciplinary action will be taken against an employee who is found to have committed any act of discrimination, harassment, or victimisation. This may be treated as gross misconduct and could result in summary dismissal.

## Monitor and measure

XPS will monitor the composition of the workforce in meeting the aims and commitments set out in this policy. This will include assessing how the inclusion and diversity policy, and any supporting action plan, are working in practice and considering and taking action to address any issues.

## Data Protection

The General Data Protection Regulation (UK GDPR) requires employers to comply with the principles for processing personal data. This does not just include customers, but also applicants, employees and leavers personal data.

This means that XPS must process such personal data only in accordance with its Data Protection Policy and Data Protection Manual; this can be found on Nexus / Legal and Compliance / Data Protection. Details of the personal data XPS collects and processes, who we share it with, how long we hold it for and what rights an employee has regarding XPS holding their personal data, can be found in our Employee Privacy Notice on NEXUS / Human Resources. As ex-employees do not have access to NEXUS, our Leaver Privacy Notice can be found on our external website.

XPS takes steps to ensure such personal data is held securely with access limited to authorised individuals only. Inappropriate access or disclosure of job applicant, employee and leaver data constitutes a data breach and must be immediately notified to [Compliance@xpsgroup.com](mailto:Compliance@xpsgroup.com) in accordance with XPS's data breach reporting requirements. It may also constitute a disciplinary offence, which will be dealt with under XPS's disciplinary procedure.

## Reference Material and Related Policies

1. Equality Act 2010
2. Fair Employment (Monitoring) Regulations (Northern Ireland) 1999
3. Disciplinary Policy
4. Grievance Policy
5. Bullying and Harassment Prevention Policy
6. Recruitment and Selection Policy
7. Training and Development Policy
8. Whistleblowing Policy
9. Evenbreak Portal

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### How can I find out more?

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For further information regarding this policy please speak to your line manager or contact Human Resources via the [HR Service Portal](#) for further information and advice.

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