

# Equality, Diversity & Inclusion Policy



## Policy & Responsibilities

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### Document History

Date	Rev	Comments
08.04.19	01	Revision of statement
06.07.21	02	Review of statement
27.03.24	03	Revision of policy statement

Prepared By	Signed	Date
Paul Clarke Managing Director		27 <sup>th</sup> March 2024

## Statement of Intent/Policy Statement

Reachout Medical recognises that its success depends on its recruitment and retention of people and encouraging them to reach their full potential within an appropriately inclusive environment.

We believe employee diversity is an asset to any business, with clear financial evidence of the impact a diverse, and inclusive culture can have on growth and profitability. People of different age groups, from different backgrounds, genders and cultures, with a range of different experiences and capabilities, help us understand and serve our customers and reach our business objectives.

We recognise the need for all parties to Reachout Medical Ltd to possess the levels of skill and knowledge appropriate to the roles they perform in delivering the quality of service our clients expect. This approach and mutual respect creates a culture of co-operation and achievement that underpins the high quality of service that we offer.

We want a truly inclusive organisation where our people can bring their “whole selves” to work, and one in which our candidates and clients can embrace the positive impact of inclusion.

At Reachout Medical Ltd we simply do not discriminate on the basis of ‘protected characteristics’. Protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

This Equality, Diversity & Inclusion Policy applies equally to the treatment of our employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment. Reachout Medical Ltd values the diverse nature of its people and seeks to manage any diversity issues which arise in a fair and sensitive manner.

Everyone has a duty to act in accordance with this policy and to treat anyone with whom they come into contact during the course of their employment with dignity at all times. We will not tolerate any discriminatory practices or behaviour.

This Policy does not form part of any employee's contract of employment and it may be amended at any time.

Reachout Medical Ltd is committed to the following:

- Recognising that our success relies on developing the potential and ability of all employees to the full. For this to occur, all employees will be given equality of opportunity and encouragement to progress within the organisation.
- Everyone is asked to take responsibility for their personal involvement in the practical application of this policy. To facilitate this:
  - Copies of the policy will be made available throughout the organisation via our sharepoint. Everyone is responsible for our success in this area and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives.
  - Those working at management level have a specific responsibility to set appropriate standards of behaviour, to lead by example and to ensure that those they manage adhere to the policy. Management Training programmes will raise awareness of the policy as well as providing support to managers in promoting equality, diversity, and inclusion in the workforce.
  - All legal obligations under relevant legislation will be recognised including:
    - ✓ The Rehabilitation of Offenders Act 1974.
    - ✓ The Local Government Act 1988 and 1999.
    - ✓ Special Educational Needs & Disabilities Act (SENDA) 2001.
    - ✓ Racial & Religious Hatred Act 2006.
    - ✓ The Work & Families Act 2006.
    - ✓ Agency Workers Regulations 2010.
    - ✓ The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.
    - ✓ Worker Protection (Amendment of Equality Act 2010) Act 2023.
  - This Policy will be reviewed annually or as necessary from time to time.
  - Grievance and complaints procedures are in place to enable anyone who believes they have been treated unfairly or been subjected to discrimination, harassment, bullying or victimisation to raise the issue.
  - Discrimination may be considered an act of gross misconduct which can lead to summary dismissal or summary termination of contract/engagement.
  - The Managing Director will assume the main responsibility for implementation and revision of the policy.

## Scope of the Policy

This policy applies to all aspects of our relationship with employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment and to relations between them at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, termination and post termination of employment.

## Discrimination

The company will regard the following as discrimination:

- Discrimination may be direct or indirect and it may occur intentionally or unintentionally.
- Direct discrimination occurs where someone is treated less favourably than another person because of a 'protected characteristic'. The protected characteristics are set out in our Statement of Intent referred to earlier in the policy. Direct discrimination includes discrimination by association and discrimination by perception.
  - Associative discrimination occurs when someone is treated less favourably than another person because of association with another person who possesses a protected characteristic.
  - Discrimination by perception occurs when someone is treated less favourably because others think they possess a protected characteristic even if they do not actually possess that characteristic.
- Indirect discrimination occurs where someone is subjected to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of a protected characteristic. Indirect discrimination can be justified if it is a proportionate means of achieving a legitimate aim.
- It is also unlawful discrimination to treat a disabled person unfavourably because of something arising in consequence of their disability. This type of discrimination can be justified if you can show that the treatment is a proportionate means of achieving a legitimate aim. Disability discrimination also includes a failure to comply with a duty to make reasonable adjustments.
- Discrimination also includes victimisation which occurs when a person is subjected to a detriment because they have done a protected act or it is believed the person has done, or may do, a protected act. A protected act is, for example, when a person brings proceedings under the Equality Act 2010 or alleges that someone has contravened the Equality Act 2010. Giving false evidence or information, or making a

false allegation is not a protected act if the evidence or information is given, or the allegation is made maliciously.

- Discrimination also includes harassment which occurs when a person is subjected to unwanted conduct related to a relevant 'protected characteristic' which has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or an offensive environment.

Reachout Medical Ltd will not discriminate unlawfully when advertising, recruiting, training, promoting or selecting candidates for submission to a vacancy or assignment or in any terms of employment/terms of engagement for contractors/temporary workers.

In line with legislation, Reachout Medical Ltd recognises the following:

**Direct Discrimination** - where a person is treated less favourably than another because they have a protected characteristic, or they are perceived to have a protected characteristic, or are associated with someone who has a protected characteristic. This type of discrimination applies to all protected characteristics.

We will not discriminate against a person because of any protected characteristic:

- By refusing or omitting to provide any of our services.

Or

- In the way we provide any of our services.

Or

- In the course of undertaking their job.

Reachout Medical Ltd will not accept or act upon an instruction from a client stating that certain persons are unacceptable because of any protected characteristic unless it prevents them from carrying out a function that is intrinsic to the work concerned.

**Associative Discrimination** - this is direct discrimination and occurs where someone is treated less favourably because they associate with another person who possesses one of the protected characteristics outlined in the Equality Act 2010.

**Perceived Discrimination** - this is direct discrimination and happens where someone is treated less favourably because they are perceived to have a particular one of the protected characteristics outlined in the Equality Act 2010. It still applies even if that person does not have the protected characteristic.

**Indirect Discrimination** – this is indirect discrimination and happens where there is a condition, rule, policy or practice that applies equally to everyone, but has the effect of

being disadvantageous to a particular group who share one of the protected characteristics outlined in the Equality Act 2010 and the requirement cannot be justified as a proportionate means of achieving a legitimate aim.

Reachout Medical Ltd will not accept or act upon an indirectly discriminatory instruction from a client.

**Bullying and harassment** - Reachout Medical Ltd seeks to embed a culture which eliminates bullying and harassment. Everyone should treat others with the respect and dignity that they would expect for themselves. Bullying or harassment of others in any form will not be tolerated and will be dealt with under disciplinary procedures. Bullying or harassment may be considered as acts of gross misconduct which can lead to summary dismissal or summary termination of contract/engagement. Individuals should read and adopt the procedures detailed under the section 'Complaints' if they consider acts of bullying or harassment have taken place.

**Victimisation** - this occurs when an individual is subjected to a detriment because they have brought proceedings under the Equality Act 2010; or given evidence or information in connection with proceedings under the Equality Act 2010; or done any other thing for the purposes of or in connection with the Equality Act 2010; or raised a grievance/allegation about discriminatory behaviour. It is unlawful to victimise individuals. Employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment found to have committed acts of victimisation or inducing others to discriminate in connection with their employment, or intentionally failing to comply with the policy will be subject to disciplinary procedure. Such conduct may be considered as acts of gross misconduct which can lead to summary dismissal or summary termination of contract/engagement.

**Harassment** - unwanted conduct 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. This applies to all the protected characteristics.

**Third Party Harassment** – employees can complain of behaviour they find offensive, humiliating etc even if:

- It is not directed at them.
- They do not have the relevant protected characteristic themselves.
- The behaviour is perpetrated by a third party who is not an employee of the company.
- The behaviour is based on perception or association.

In the event that any employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment finds such behaviour offensive or believes it to be inappropriate, they should report it immediately to their line manager (or the Managing Director if they would find this difficult or the issue is against their line manager), who will log the incident and take action to prevent recurrence.

**Reporting of Harassment** - it is the duty of Reachout Medical Ltd to analyse all reported incidences of harassment. Where such harassment has occurred on at least two separate occasions since 1<sup>st</sup> October 2010 (and we are aware that it has taken place) we have a duty to monitor the situation and to take steps to prevent it from happening again.

**Human rights** – Reachout Medical’s business activities are pursued with respect for human rights. It is not acceptable to abuse the human rights of either individuals or groups of individuals or to fail to operate in a manner consistent with the principles of the Human Rights Act 1998. We will not participate in, contribute to or obtain information from any blacklist or other similar service which undermines these principles and as part of this obligation, we will ensure that compliance this policy, will form part of the selection process for appointing subcontractors and other members of the supply chain.

## Harassment & Dignity at Work

Reachout Medical Ltd is committed to providing a work environment free from unlawful harassment. Harassment is defined as unwanted conduct. Examples (non-exhaustive list) of prohibited harassment are:

- Verbal or written conduct containing derogatory jokes or comments (e.g. sexist, racist, homophobic, disablist etc.).
- Slurs or unwanted sexual advances.
- Visual conduct such as derogatory or sexually orientated posters.
- Photographs, cartoons, drawings or gestures which some may find offensive.
- Physical conduct such as assault, unwanted touching, or any interference.
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours.
- Retaliation for having reported or threatened to report harassment.

This policy prohibits unlawful harassment.

Employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during

the course of their employment will be able to complain of behaviour that they find offensive (including third party harassment) even if it is not directed at them.

Any person that believes they have been unlawfully harassed or who has witnessed harassment or offensive behaviour should make an immediate report to their line manager (or the Managing Director if they would find this difficult or the issue is against their line manager) followed by a written complaint as soon as possible after the incident in line with the complaints process outlined below.

The complaint should include:

- Details of the incident.
- The name or names of the individual or individuals involved.
- The names or names of any witness or witnesses.

Reachout Medical Ltd will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, we will take such steps as are reasonably practicable to mitigate and prevent continued harassment. Any employee who we find to be responsible for unlawful harassment will be subject to the disciplinary procedure.

## Occupational Requirement

If possessing a particular protected characteristic is a requirement of a specific job (not of an employer), we will not employ or assign a candidate who does not possess that protected characteristic where the client can show that applying the requirement is a proportionate means of achieving a legitimate aim. The requirement must be crucial (or intrinsic) to the job and not merely one of several important factors (for example the job requires someone of a particular sex for reasons of privacy and dignity).

## Pre-Employment Health Questionnaires

In line with current legislation, we will not ask questions relating to a candidate's health either verbally or in writing prior to making a conditional job offer/ short-listing for an assignment unless it is necessary for the purpose of:

- Establishing whether the candidate will be able to comply with a requirement to undergo an assessment for the job or establishing whether reasonable adjustments are needed in respect of any such assessment;
- Establishing whether the candidate will be able to carry out a function that is intrinsic to the work concerned;



- Establishing whether there is a duty to make reasonable adjustments for a disabled person in relation to the selection process;
- Monitoring diversity amongst candidates making the application for jobs;
- Taking positive action (e.g. guaranteed interviews for disabled people); and
- Establishing an 'occupational requirement' where having a particular disability is essential to the job.

**Sickness/ Absence** – we will not discriminate against a candidate due to time off or absence from work due to ill-health or disability during any part of the recruitment, selection or referencing process. Reachout Medical Ltd will ensure all gaps in employment are sensitively explored to understand an individual's background, to enable full support throughout the recruitment, selection and referencing process.

**Conditional Offers** - we will ensure that candidates are made aware of any offer of employment that is conditional on satisfactory responses to health related questions, and instruct them not to resign from their current role pending receipt of a satisfactory outcome. In the event that a conditional offer of employment is withdrawn because of a health related issue, Reachout Medical Ltd will provide the candidate with feedback on the reasons for the withdrawal of the offer. This information will be documented and retained for audit purposes.

**Accuracy of Health Related Information** – where information relating to health or disability is required to establish whether a candidate will be able to carry out a function that is intrinsic to the work concerned, we require such questions to be answered honestly and in full. False information provided by a candidate in such circumstances may lead to withdrawal of the job offer or in the case of an employee, disciplinary action.

## Disability

Disability discrimination takes place where a detriment arising from disability occurs and the employer cannot show that the treatment was a proportionate means of achieving a legitimate aim. A disability is defined as an impairment that has a substantial and long-term (12 months +) effect on a person's ability to carry out normal day-to-day activities.

Reachout Medical Ltd will not discriminate directly or indirectly, harass or victimise any person on the grounds of their disability.

We are committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions. We may request information regarding disability as part of the recruitment process but such information will not be used as selection, training or promotion criteria or in any detrimental way and is only

for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process. Any data shared is anonymous. Information regarding disability will only be required when it is intrinsic to the role.

We will ensure our employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment (wherever possible) will fulfil their duties to make reasonable adjustments and remove barriers throughout the recruitment process and in employment so individuals with disabilities can fully participate.

We will take reasonable steps to provide auxiliary aids or services if this would make it easier for a disabled person to use their services (e.g. provision of a sign language interpreter). To achieve this, we must be informed that the candidate/ employee has a disability together with the nature of the disability to make such reasonable adjustments or provide appropriate auxiliary aids and services.

Reachout Medical Ltd will not discriminate against a disabled person because of their disability:

- In the arrangements e.g. application form, interview or arrangements for selection for determining to whom a job should be offered; or
- In the terms on which employment is offered; or
- By refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- In the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording them any such opportunity; or
- By subjecting them to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment); or
- Because of a situation that is connected with their disability (i.e. discrimination arising from a disability) where such treatment cannot be objectively justified as being a proportionate means of achieving a legitimate aim.

Reachout Medical Ltd will accordingly make career opportunities available to people with disabilities and every practical effort will be made to provide for the needs employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment.

Wherever possible, we will make reasonable adjustments for disabled employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other

contacts of the company, and anyone else with whom they come into contact during the course of their employment.

## Age

Reachout Medical Ltd will not discriminate against any person because of their age.

We will not include age criteria in job specifications, advertisements or interview/ assessment processes unless we are legislatively required to do so due to the nature of the job. We are committed to recruiting and retaining employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age.

We will also inform employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment of their obligations to shortlist on the basis of competence and skills and not age where they are responsible for decisions during the recruitment/ selection process.

We may request date of birth as part of its recruitment process but such information will not be used as selection, training or promotion criteria or in any detrimental way and will be used only for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process.

## Gender Reassignment

Reachout Medical Ltd recognises that any employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment may wish to transition during the course of their employment with the company.

We will make every effort to protect any employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment that has undergone, is undergoing or intends to undergo gender reassignment from discrimination or harassment within the workplace.

Any employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into

contact during the course of their employment suffering discrimination or harassment in the workplace because of gender reassignment should report the incident using the company's complaints procedure and where appropriate invoke the company's grievance procedure.

## Religion or Belief

Reachout Medical Ltd will not discriminate because of religious or other beliefs (including non-religious beliefs). We are committed to recruiting and retaining employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment whose skills, experience and attitude are suitable for the requirements of the various positions regardless of religion or belief.

## Sexual Orientation

Reachout Medical Ltd will not discriminate directly or indirectly, harass or victimise any person on the grounds of their sexual orientation. We will encourage clients not to include any sexual orientation criteria in job specifications and every attempt will be made to ensure clients to recruit on the basis of competence and skills and not sexual orientation. We respect the rights of everyone irrespective of whether or not they are open about their sexual orientation.

## Sex

Reachout Medical Ltd will not discriminate directly or indirectly, harass or victimise any person on the grounds of their sex. We will encourage clients not to include any gender criteria in job specifications and every attempt will be made to ensure clients recruit on the basis of competence and skills and not sex.

We are committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of gender.

## Race

Reachout Medical Ltd will not discriminate directly or indirectly, harass or victimise any person on the grounds of their race. We will encourage clients not to include any race criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skills and not race.

We are committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of race. No race requirements will be stated in any job advertisements on behalf of the company.

## Pregnancy & Maternity

Reachout Medical Ltd will not discriminate directly or indirectly harass or victimise any person on the grounds of pregnancy or maternity. People should be treated fairly in the workplace throughout their maternity period and supported appropriately through pregnancy. We will encourage clients to recruit on the basis of competence and skills and not discriminate due to pregnancy or maternity.

## Marriage & Civil Partnership

Reachout Medical Ltd will not discriminate directly or indirectly, harass or victimise any person on the grounds of marriage or civil partnership. People should be treated fairly in the workplace irrespective of their marriage/ civil partnership status.

## Part-Time Workers

This policy also covers the treatment of those employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment who work on a part-time basis. We recognise that part time employees must be treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to pension facilities. We also recognise that part time employees must be treated the same as full time employees in relation to training and redundancy situations. Reachout Medical Ltd monitors the conditions of service of part-time employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities.

Reachout Medical Ltd will ensure requests to alter working hours/work flexibly are dealt with appropriately.

## Fixed-term Employees and Agency Workers

Reachout Medical Ltd monitors the use of fixed-term employees and agency workers and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities.

## Management Responsibilities

Compliance with the policy depends upon the commitment of everyone, including all directors, managers and supervisors who will take a lead in implementing it and keeping the workplace free of discrimination (including harassment and victimisation) and bullying. Prompt action will be taken to resolve any complaints and prevent any further recurrence.

## Individual Responsibilities

Reachout Medical Ltd encourages all individuals to take responsibility for their personal involvement in the practical application of the policy, and for creating a work environment which eliminates all forms of discrimination (including harassment and victimisation) and bullying. Any employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment found to have breached the policy in their working relations with others will be subject to the disciplinary procedures detailed in the employee handbook, up to and including summary dismissal. Anyone found to have breached the policy in their working relations with others will be subject to action up to and including summary termination of contract/engagement.

## Monitoring & Positive Action in the Recruitment Process

### **Recruitment of employees**

It is our intention to recruit for any position in a fair and non-discriminatory manner.

It is essential that recruitment and selection procedures are based on objective criteria related to the needs of the job, and that such criteria are applied equally at all stages during the process to all applicants at all levels within the organisation (subject to any reasonable adjustments being made to the selection process).

Reachout Medical Ltd is committed to give ex-offenders an equal opportunity to enter the workplace.

## Recruitment procedures

- All advertisements should conform to an inclusive standard. Recruitment and publicity literature will state that we are an equality, diversity, and inclusion employer.
- Each role advertised should be accompanied by a full job description and person specification.
- Vacancies should be publicised appropriately to as wide a range of suitable candidates as possible. Personal word of mouth recommendations should not be used as the sole method of recruitment.
- Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying.
- All job applicants are required to complete an online application process. Equal opportunity information gathered at application stage should be stored anonymously on a central database for reporting purposes only. It should not be used to form part of the short-listing process under any circumstances; short-listing should be done by merit of application and by no other means. Disclosure of such equal opportunity information should be optional to candidates.
- Applicants will not be asked about past or current pregnancy or childbirth or future intentions related to pregnancy or childbirth.
- Candidates will not be asked health-related questions before a job offer is made except where the question is necessary to decide whether any reasonable adjustments should be made to the selection process, to establish whether a candidate will be able to carry out a function that is intrinsic to the job or to monitor diversity amongst people applying for jobs.
- When a candidate with a disability is invited to attend for interview, Reachout Medical Ltd will make any reasonable adjustments necessary to facilitate their attendance. Candidates should advise us where such adjustments are necessary.
- Reachout Medical Ltd will take appropriate and reasonable steps to accommodate the requirements of candidates' religions, cultures and domestic responsibilities.
- Directors may, at their discretion, use professional search consultants if the appointment is of a senior or specialist nature, and where obtaining suitably qualified candidates by traditional recruitment methods is regarded as unlikely to secure the most talented candidates.
- Reasons for rejection of all candidates should be recorded and retained in accordance with timescales set out in recruitment legislation.
- Any psychometric testing or examinations used as part of the recruitment process will be carried out by qualified personnel only.
- Reachout Medical Ltd is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status will not be based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documentation (such as a passport)

before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the UK Border Agency.

Positive action will take place where:

- People who share a protected characteristic suffer a disadvantage connected to the characteristic or have needs that are different from those who do not share the characteristic; or
- Participation in an activity by persons who share a protected characteristic is disproportionately low.

In these circumstances, proportionate steps will be taken to meet their needs or to enable and encourage them to overcome/ minimise the disadvantage or participate in the relevant activity.

### **Monitoring**

- We will monitor demographic and organisational data to ensure that there is not significant under-representation in participation in an activity by persons who share a particular protected characteristic and in the event that such under-representation is identified, will take appropriate remedial action.
- As part of our commitment to equality, diversity and inclusion, monitoring will be carried out at the recruitment stage, and at subsequent regular intervals during the individual's career. Our application process includes a diversity monitoring procedure which enables all applicants and employees to declare (if they wish to do so) their 'protected characteristics'. Information from monitoring will assist us to assess the success of this policy. In particular, we will report on key measures which include gender composition of the workforce, age, race & ethnic origin and sexual orientation, disability, religion or belief. Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 2018 and GDPR.

### **Job Descriptions and Working Patterns**

- Job descriptions and/or person specifications will include only those requirements, qualifications and characteristics that are essential or desirable for the effective performance of the role. It will be made clear which items are essential and which are only desirable.
- Whilst it is permissible to indicate the standard hours of a job and/or that it is full time, if an employee or applicant wishes to propose some other pattern of work, this will be carefully considered and only rejected if it is justified.



### **Advertising, Recruitment and Promotion**

- We will take all reasonably practicable steps to circulate information about vacant posts as widely as reasonably practicable in the circumstances.
- No recruitment literature or advertisements will imply a preference for any one group of applicants, unless there is an occupational requirement which limits the post to a particular group, in which case this will be clearly stated. However, if there is an imbalance in the workforce, the company will actively welcome applications from candidates from under-represented protected characteristic groups.
- All selection interviews and shortlisting will be conducted on an objective basis and deal only with the individual's suitability for the job, taking into account their skills and experience.
- Questions will only be asked during interview about a candidate's personal and domestic circumstances or plans if they relate directly to the job requirements, and will then be asked of all candidates applying for the post.
- Recruitment, employment and promotion decisions will be made on the basis of merit and evaluated against fair and objective criteria.

## **Positive Action – Training, Promotion and Conditions of Service**

### **Employee Development and Training**

Reachout Medical Ltd wishes to ensure that no employee is disadvantaged in the provision of appropriate training and development opportunities.

The following procedures should be followed:

- All employees should participate in the annual performance review exercise, which will assess their current level of job performance as well as their training and career development needs.
- All employees will have access to and be encouraged to take advantage of suitable training and development opportunities.
- Decisions relating to career development should be based on objective criteria which are fairly applied. The ability to meet the requirements of the position successfully should be the main criterion for promotion. Training is provided in order to increase the knowledge and skills of employees and all training course materials and content will reflect our position as an equality, diversity and inclusion employer. If someone is disabled, or becomes disabled in the course of their employment or engagement, they are encouraged to inform Reachout Medical Ltd about their condition as soon as

possible in order that they can be supported, and reasonable adjustments made for them if required.

- Employees, consultants, contractors, temporary workers, job applicants, clients, suppliers, other contacts of the company, and anyone else with whom they come into contact during the course of their employment will be provided with appropriate training (depending on the needs of the business) to enable them to improve their performance and to achieve the performance standards and targets set for them by the company.
- Special responsibility for the practical application of the company's Equality, Diversity & Inclusion Policy falls upon staff involved in the recruitment, selection, promotion and training of employees, and/or conducting the company's grievance and disciplinary procedures.
- All reasonable measures will be taken to ensure that all employees are given the opportunity to participate fully in the workplace, in training and in career development opportunities.
- Underrepresented groups will be encouraged to apply for training and employment opportunities with the company. Wherever possible, specific training will be provided for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, recruitment decisions for all jobs will be strictly based on merit.
- Wherever necessary, use will be made of lawful exemptions to recruit suitably qualified people to cater for the specific needs of particular groups.
- Wherever possible, efforts will be made to identify and remove unnecessary/unjustifiable barriers and provide appropriate facilities and conditions of service to meet the specific needs of disadvantaged and/ or underrepresented groups.

## Personnel Records

- In order to ensure the effective operation of the Equality, Diversity & Inclusion Policy (and for no other purpose) a record will be kept of employees' and job applicants' 'protected characteristics' should they choose to disclose these on the diversity monitoring questionnaire.
- Where necessary, employees will be able to check/correct their own record of these details. Otherwise, access to this information will be strictly restricted.
- Such records will be analysed on a regular basis to allow appropriate follow-up action to be taken.

## Complaints

If anyone feels they have a grievance or a complaint under the policy they may, in the first instance and if they wish and feel comfortable to do so, make the issue known to the person

responsible for the behaviour and request that it should cease. Individuals may also, as an alternative, seek the direction and guidance of their director/managing director, manager or member of HR in attempting to resolve matters in an informal manner. Individuals should make any concerns known to a director, manager or a member of HR as soon as possible. Where it does not prove possible to reconcile issues informally, or if a person does not want a matter dealt with informally, employees should make a complaint using the grievance procedure (and complaints by anyone else will also be investigated). The grievance procedure is set out in the employee handbook which is provided to all employees on commencement of their employment and is also displayed and available to download from the cloud server.

Grievances or complaints linked to equality, diversity and inclusion will be dealt with in the strictest confidence and will not prejudice the employee's current employment status or future career prospects (or the worker's/ contractor's current status or future prospects with Reachout Medical Ltd. Vexatious allegations, false allegations made maliciously, or a breach of the policy may, however, be considered a disciplinary offence. Vexatious allegations or false allegations made maliciously may result in disciplinary action up to and including summary dismissal or summary termination of contract/engagement. Allegations regarding potential breaches of the policy will be treated in confidence and fully investigated.

## Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

Signed: 

**Name: Paul Clarke**

**Designation: Managing Director**

**Company Name: Reachout Medical Ltd**

**Date: 27.03.24**