

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 know that talent is not dictated by race, ethnicity, gender, disability, sexual orientation, age, religion, social class, or background. We recognise the value that people from all backgrounds can bring to the workplace.

As an employer XPS Pensions Group has a responsibility for promoting employment policies and practices within this workplace, which seek to eliminate unlawful and unfair discrimination and fulfil our legal obligations.

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

Objectives

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

Who does this policy cover?

Existing and prospective employees of XPS Pensions Group including those on fixed-term contracts, agency workers and self-employed contractors. XPS Pensions Group also respects 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.

Key points

- To provide an environment free from discrimination, harassment, bullying or victimisation of any kind.
- To treat all prospective and existing employees openly 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 make-up 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 ensure all actions taken are fair and reasonable.
- To comply with our statutory responsibilities.

Relevant Legislation

The Equality Act 2010 came into force in October 2010 and replaces the previous anti-discrimination laws with a single Act. It simplifies the law, removing inconsistencies and making it easier for people to understand and comply with. It also strengthens the law in important ways to help tackle discrimination and inequality.

We also comply with the Fair Employment (Monitoring) Regulations (Northern Ireland) 1999 for our Northern Ireland office.

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 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.
- 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 consequences of any unacceptable behaviour.
- Being aware of employees' behaviour and acting immediately on all complaints.
- Being sensitive to the concerns of their staff, remembering it is the employees' perception which is important.

Candidates applying for a vacancy are responsible for:

- Ensuring they behave in accordance with the principles of this policy.

Title	Owner	Version	Date	Review Date	Page
Inclusion & Diversity Policy	HR	4	May 2023	May 2024	2 of 6

- Reporting any unacceptable behaviour, they are subjected to or observe to Human Resources.
- Reporting any bullying or harassment to HR.

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.

What is Discrimination?

Discrimination can be based on a person's colour, race, nationality, ethnic or national origin, sex, gender identity, marital status, disability, religious belief and age. It can take various forms:

- Direct discrimination occurs when a person is treated less favourably on the grounds of their sex, marital status, ethnic origin, colour, nationality, disability, gender identity, race, religion or age. It is, therefore, generally unlawful to make employment related decisions on this basis.
- Indirect discrimination can occur when an unjustifiable requirement or condition is applied equally to all people, but it is found that one particular group of people cannot comply because of their race, sex, disability or any other protected characteristic and this in turn causes them to suffer detrimentally.
- Dual discrimination can occur when a person is treated less favourably on the basis of having two or more of the above protected characteristics.
- Victimisation relates to less favourable treatment of an individual who has complained under the relevant Acts, or who is assisting someone in this regard. It is unlawful to discourage or prevent people from complaining under the Acts.
- Sexual harassment is 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. For further details on harassment please refer to the Bullying and Harassment Prevention Policy.
- 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 (see associative discrimination below).
- Disability Discrimination As part of becoming Disability Confident Level 1, it is Company policy to give full and fair consideration to every application for employment from

Title	Owner	Version	Date	Review Date	Page
Inclusion & Diversity Policy	HR	4	May 2023	May 2024	3 of 6

disabled people. Selection will be based on ability and aptitude alone in relation to the various vacancies available.

- With regard to employees who acquire a disability during their employment with XPS, it will be standard practice to make reasonable adjustments to assist them with all aspects of their role. Please refer to the [Workplace Adjustment policy](#) for further guidance and support with this. If redeployment becomes necessary, all alternatives will be fully considered. Flexibility in working procedures and any special training requirements will be provided where possible.
- Associative Discrimination occurs when a person is treated less favourably because they associate with someone who possesses a protected characteristic (i.e., age, disability, gender identity, race, religion or belief, gender, sexual orientation).
- Perceptive Discrimination occurs when a person is treated less favourably because others think they possess a protected characteristic whether or not they actually do (see above).

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 discuss 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 that no discrimination takes place
- Application forms and processes for selection provided by the Recruitment team should be used during the process as these are non-discriminatory. The selection criteria should be set at the outset of the recruitment process, to ensure that the

Title	Owner	Version	Date	Review Date	Page
Inclusion & Diversity Policy	HR	4	May 2023	May 2024	4 of 6

information gathered is not subjective, but 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 the objectivity of selection.

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 priority on training as their full-time counterparts.

How this policy applies to the XPS Pensions 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 may be taken against an employee who is found to have committed any act of discrimination.

Discriminatory conduct and sexual or racial harassment will be treated as gross misconduct and could result in summary dismissal.

Monitor and measure

XPS will monitor the make-up 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.

Title	Owner	Version	Date	Review Date	Page
Inclusion & Diversity Policy	HR	4	May 2023	May 2024	5 of 6

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. However, inappropriate access or disclosure of job applicant, employee and leaver data does constitute a data breach and must be immediately notified to 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. Harassment and Bullying Prevention Policy
6. Recruitment and Selection Policy
7. Training and Development Policy
8. Whistleblowing Policy

How can I find out more?

For further information regarding this policy please speak to your line manager or Human Resources directly at hr@xpsgroup.com