



Diversity & Inclusion Policy

03 July 2020

Diversity & Inclusion Policy

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 different 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 promote a welcoming and inclusive culture for all.

This Diversity and Inclusion policy applies to existing and prospective employees, but XPS Pensions Group also respects stakeholder diversity and as such works to develop strong and sustainable relationships with our diverse stakeholders including communities, employees, governments, customers and suppliers.

Objectives

- > To promote a diverse and inclusive culture and working towards 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 Diversity and Inclusion Policy and to ensure that they understand the supporting policies and process should they wish to raise an issue or concern.

Principles underpinning this policy

- > 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 implement appropriate sanctions (eg disciplinary action) regarding any behaviour resulting in unfavourable treatment may be a matter for disciplinary action
- > To ensure that decisions on recruitment, selection, training, promotion and career development 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

Whom does this policy cover?

Everyone employed by XPS Pensions Group, including employees on fixed term contracts, agency workers and self-employed contractors. In addition candidates applying for a role at XPS Pensions Group are included.

What is the Equality Act 2010?

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.

For our employees and candidates applying for a role in Northern Ireland, consideration will be given to the Equality legislation as outlined by the Equality Commission for Northern Ireland.

Roles and responsibilities

Employees are responsible for:

- > Reporting any unacceptable behaviour they are subjected to, or observe and taking action on behalf of their colleagues where appropriate.
- > Reporting any bullying or harassment by customers, suppliers, visitors or others to their line manager
- > Adhering to this Policy, noting that employees can be personally accountable under law for any discriminatory action undertaken on their part
- > Co-operating with any measures introduced to develop equal opportunities
- > 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 both the letter and spirit of this policy
- > Ensuring that neither they, nor their staff for whom they are responsible, are subject to discrimination
- > Communicating to their team, the 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
- > Attending training and regular updates on how to promote an inclusive environment

Candidates applying for a vacancy are responsible for:

- > Reporting any unacceptable behaviour they are subjected to or observe to Human Resources
- > Reporting any bullying or harassment to Human Resources

Human Resources are responsible for:

- > Ensuring complaints are dealt with promptly and confidentially
- > Supporting line managers, employees and prospective candidates with any issues relating to this policy
- > Acting as a confidential point of contact for line manager and employees
- > Organise training and upskilling events
- > Partnering with organisations with specialist knowledge

What is discrimination?

Discrimination can be based on a person's race, nationality, ethnic or national origin, sex, sexual orientation, 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, nationality, disability, sexual orientation, 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 or disability and this in turn causes them to suffer detrimentally.
- > **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 him or her to feel threatened, humiliated, patronised or harassed as a result of his or her sex.
- > **Racial harassment** is behaviour which causes the recipient to feel threatened, disadvantaged or the subject of abuse because of his or her race, nationality or ethnic origins
- > **Third party harassment** occurs where an employee or prospective employee is harassed by a third party (e.g. a customer), and the harassment is related to a protected characteristic (see associative discrimination below).
- > **Disability Discrimination** It is Company policy to give full and fair consideration to every application for employment from disabled people. Selection will be based on ability and aptitude alone in relation to the various vacancies available.
With regard to employees who are disabled whilst in our employ, it will be standard practice to make reasonable adjustments to assist them with all aspects of their role. 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 reassignment, 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 (see above).

How this policy applies to recruitment and selection

Equal opportunities should be applied throughout the recruitment and selection process and the following is a set of guidelines to assist line managers through this process:

- > All Company vacancies will be advertised internally in order that all employees have an opportunity to apply unless there is market sensitivity constraints
- > All advertisements should be organised in conjunction with Human Resources, not only to ensure the correct Company format is used, but to also ensure that the advertisement is not discriminatory
- > External agencies will be made aware that the Company is an equal opportunities employer through distribution of company principles
- > All staff involved in the recruitment process should receive training prior to recruitment being undertaken. We are reviewing training for hiring managers to include interview and selection methods and this will be completed by the end of the year. Application forms and processes for selection by the Company should be non-discriminatory. The selection criteria must be set at the outset of the recruitment process, with the aim that the information gathered is not subjective, but relevant and justifiable in the context for which it should be used.

How this policy applies to Training, Development and Performance Management

Training, Development and Performance Management are areas where it is essential to have good equal opportunities practice. 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 should not be used as criteria for assessing promotion. Decisions should be made on ability and skill
- > All employees should have equal access 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

- > Disciplinary action may be taken against an employee who is found to have committed any act of discrimination. Any member of staff may use the appropriate procedure grievance or bullying and harassment 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.

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

Personal Data

The organisation treats personal data collected for reviewing equality of opportunity in recruitment and selection in accordance with its data protection policy. Information about how data is used and the basis for processing is provided in the organisation's job applicant privacy notice.

GDPR

The General Data Protection Regulation (GDPR) requires employers to comply with principles for processing personal data, including protecting against unauthorised access of personal data. Personal data that is inappropriately accessed or disclosed may constitute a data breach. The GDPR requires organisations to keep a record of all data breaches and, where the breach is likely to result in a risk to the rights and freedoms of individuals, the organisation must notify the Information Commissioner within 72 hours of becoming aware of the breach. If the data breach results in a high risk to the rights and freedoms of individuals, those individuals must be notified without undue delay.

How can I find out more?

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



Contact us
xpsgroup.com

Registration

XPS Pensions Consulting Limited, Registered No. 2459442.

XPS Investment Limited, Registered No. 6242672.

XPS Pensions Limited, Registered No. 3842603.

XPS Administration Limited, Registered No. 9428346.

XPS Pensions (RL) Limited, Registered No. 5817049.

Trigon Professional Services Limited, Registered No. 12085392.

All registered at: Phoenix House, 1 Station Hill, Reading, RG1 1NB.

Authorisation

XPS Investment Limited is authorised and regulated by the Financial Conduct Authority for investment and general insurance business (FCA Register No. 528774).

30/06/2020