



Equality, Inclusion and Diversity Policy



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Kao Data Campus Locations

- London Road, Harlow, CM17 9NA
- Galvin Road, Slough, SL1 4AN
- Rowdell Road, Northolt, UB5 6AG

Document Change History

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V1.1	20/05/2022	New format, content, structure	Gary Kilmister	Joanna Breen
V1.2	02/06/2022	Revision updates and content added	Joanna Breen	Gary Kilmister
V1.3	22/08/2022	Published version (sign off)	Gary Kilmister	Paul Finch Lee Myall
V2.0	24/08/2022	Published version (signed off)	Gary Kilmister	Gary Kilmister
V2.1	10/07/2023	Minor amendment made to footer to remove reference to ISO standards	Katie Harper	Gary Kilmister
V2.2	14/07/2023	Annual Review - no changes required	Gary Kilmister	Jo Breen
V2.3	02/08/2023	Submitted for review, approval and sign off – Retained as v2 as no content changes made	Gary Kilmister	Paul Finch Lee Myall
V2.4	03/08/2023	Re-Published version (signed off)	Gary Kilmister	Gary Kilmister

Distribution List

Copy Number	Job Title / Purpose	Location
000	Master	SharePoint
001	Site Copy – Displayed	Harlow Breakout Room
002	Site Copy – Displayed	Slough Breakout Room
003	Site Copy – Displayed	Northolt Breakout Room

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2 Purpose

Kao Data is an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The purpose of this policy is to ensure that no person receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.

3 Applicability

This policy is applicable to all stakeholders, employees, and directly employed contractors working for Kao Data.

4 Policy

The terms equality, inclusion, diversity, and equity are at the heart of this policy. 'Equality' means ensuring everyone has the same opportunities to fulfil their potential free from discrimination. 'Inclusion' means ensuring everyone feels comfortable to be themselves at work and feels the worth of their contribution. 'Diversity' means the celebration of individual differences amongst the workforce. 'Equity' means recognising barriers and that some groups are more advantaged than others, and putting measures in place to eliminate these barriers, ensuring equal opportunities for all. We will actively support diversity, equity and inclusion and ensure that our workforce is valued and treated with dignity and respect. We want to encourage everyone in our business to reach their potential.

We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. This policy covers all employees, officers, consultants, contractors, volunteers, casual workers and agency workers and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored, and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct, or indirect, overt, or latent exists.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regards to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

Human Resources and Compliance have particular responsibility for implementing and monitoring the Equality and diversity policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

All employees, workers, or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be based on aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.

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Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Company as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of everyone to this policy and application of its principles are essential to eliminate discrimination and provide equality and equity throughout the Company.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting either HR or the Compliance Director

Breaches of this policy will be dealt with in accordance with our Disciplinary Procedure. Serious cases of discrimination may amount to gross misconduct resulting in dismissal without notice.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or through our Anti-harassment and Bullying Policy.

Our commitment as an employer

The Company is committed to:

- creating an environment in which individual differences and the contributions of our staff are recognised and valued.
- everyone is entitled to a working environment that promotes dignity and respect to all.
- no form of intimidation, bullying or harassment will be tolerated.
- providing training, development, and progression opportunities to all staff.
- understanding equality and inclusion in the workplace is good management practice and makes sound business sense.
- reviewing all our employment practices and procedures to ensure fairness and inclusion for all.
- taking steps to ensure equity amongst our workforce such as ensuring that our vacancies are advertised to a diverse range of potential candidates and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our Company, taking positive action to recruit disabled people, and ensuring there are no unlawful barriers to accessing our employment opportunities, training, progression opportunities, benefits, and facilities.
- diversity in our workforce will be regularly monitored to ensure equal opportunities throughout the Company. Where appropriate, measures will be taken to identify and remove unnecessary obstacles and to meet the special needs of disadvantaged or underrepresented groups.
- monitoring and reviewing this policy annually.

Our commitment as a service provider

The Company is committed to:

- providing services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
- making sure our services are delivered equally and meet the diverse needs of our service users and clients.
- taking steps to ensure equity amongst our clients and service users such as removing any unlawful obstacles to accessing our services or facilities. Where appropriate, measures will be taken to identify and remove unnecessary barriers and to meet the special needs of disadvantaged or underrepresented groups.
- fully supporting this policy by senior management.
- monitoring and reviewing this policy annually.
- having clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.

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Equal opportunity policy statements

Age

We will:

- ensure that people of all ages are treated with respect and dignity.
- ensure that people are given equal access to our employment, training, development, and promotion opportunities and
- challenge discriminatory assumptions about younger and older people.

Disability

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities. If we feel that a particular adjustment would not be reasonable, we will discuss this with you and try to find an alternative solution where possible.
- challenge discriminatory assumptions about disabled people and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.
- if you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.
- we will keep the physical features of our premises under review to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

Race

We will:

- challenge racism wherever it occurs.
- respond swiftly and sensitively to racist incidents and
- actively promote race equality and inclusion in the Company.
- take positive action to redress the negative effects of discrimination against everyone.
- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same.

Gender

We will:

- challenge discriminatory assumptions about gender.
- take positive action to redress the negative effects of discrimination against everyone.
- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same and
- provide support to prevent discrimination against transgender people who have or who are about to undergo gender reassignment.

Sexual orientation

We will:

- ensure that we take account of the needs of everyone, including the LGBTQ+ communities
- promote positive images of the LGBTQ+ communities.
- challenge discriminatory assumptions about the LGBTQ+ communities.
- take positive action to redress the negative effects of discrimination against everyone and
- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same.

Religion or belief

We will:

- ensure that employees' religion or beliefs and related observances are respected and

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- accommodated wherever possible and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

Pregnancy or maternity

We will:

- ensure that people are treated with respect and dignity during pregnancy or maternity leave.
- challenge discriminatory assumptions about pregnancy or maternity and
- ensure that no individual is disadvantaged during pregnancy or maternity leave and that we take account of the needs of our employees' during pregnancy or maternity leave.

Marriage or civil partnership

We will:

- ensure that people are treated with respect and dignity regardless of marriage or civil partnership status.
- challenge discriminatory assumptions about the marriage or civil partnership of our employees and
- ensure that no individual is disadvantaged because of their marriage or civil partnership status.

Part time and fixed term work

Part time and fixed term staff should be treated the same as comparable full time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Equal pay

We will ensure that all employees have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

5 Sign off

Signed

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Lee Myall
 Chief Executive Officer, Kao Data
 Published: August 2023

Signed

DocuSigned by:

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Paul Finch
 Chief Operating Officer, Kao Data
 Published: August 2023

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