


Equality & Diversity Policy

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Version Change Summary		
New Version ID	Date of Change	Summary of Changes
1	14/12/2020	Creation
2	14/2/2022	Review (no change)
2.1	25/08/2023	Review (no change)
2.2	13/12/2023	Reviewed legislation
2.3	22/01/2025	Updated CEO Details

1. PURPOSE

To promote equal treatment for all employees or potential employees irrespective of race (including colour, national or ethnic origin), sex and sexual orientation, gender reassignment, religion or belief, disability, age, marriage and civil partnership, pregnancy and maternity, or part time and fixed term employment status, and ensure that this is managed in such a way that the Company complies with Equality Act 2010 and Codes of Practice.

2. SCOPE

All established and temporary employees as well as all job applicants, workers, consultants and sub-contractors. This policy has particular relevance to all those concerned with recruitment, training and promotion procedures and/or decisions.

3. POLICY STATEMENT

Rock Compliance (referred to as “the Company”), welcomes the bringing together of people from a wide variety of backgrounds and experiences and is committed to developing a working culture that is fair and inclusive, enabling all employees to make their distinctive contributions to the benefit of the business. We are also determined to ensure that we extend this same openness to all our customers, suppliers, business partners and the communities in which we operate. Individuals throughout the Company are expected to help to create a positive working environment by supporting colleagues and treating others with respect, dignity and courtesy. We expect our managers to exercise leadership in this field by discouraging prejudice, and to lead by example.

Equal Opportunities

We provide equal opportunities to all existing and prospective employees recognising that our reputation is dependent on the quality, effectiveness, and skill base of our employees. We are committed to the fair and equitable treatment of all our employees and specifically to prohibiting discrimination on the grounds of race, religion, belief, sex, sexual orientation, nationality, ethnic origin, disability, age, marital status. Opportunities are available to disabled persons in accordance with their abilities and aptitudes on equal terms with other employees.

Discrimination

Discrimination can be direct or indirect, associative, or victimisation.

Direct discrimination occurs when an employee is treated less favourably than another employee because of a protected characteristic that he/she has or is thought to have, or because he/she associates with someone who has a protected characteristic.

Indirect discrimination can occur when a condition, rule, policy or practice in the Company which applies to all employees but particularly disadvantages employees who share a protected characteristic.

Discrimination by association is a direct discrimination against an employee because he/she associates with another person who possesses a protected characteristic. This is direct discrimination against an employee because others think he/she possess a particular protected characteristic. It applies even if he/she does not actually possess that characteristic.

Victimisation occurs when an employee is treated at a detriment, or is disadvantaged because he/she has made, or intends to make, a complaint about being discriminated against, or that he/she has acted or intends to act in support of another employee who is making a complaint about being discriminated against.

Diversity

We are committed to the development of a diverse workforce, as diversity not only benefits individuals by helping to create a positive working environment in which our employees can develop rewarding careers, but also enriches our pool of talent, bringing new ways of thinking and enabling us to understand better the needs of all of our customers and provide outstanding service. Diversity is also seen as an important part of the Company's commitment to corporate responsibility, our impact on the local community and the environment.

Key aims

Our key aims in embedding the Company's principle of diversity are to:

- Promote and maintain an inclusive and supportive work environment, which affirms the rights of individuals to be treated fairly with respect and enables them to fulfil their potential. We undertake to recruit, develop and retain the best employees by valuing the varied skills and experiences they can bring. We invest in employee development, treat employees fairly and equitably and encourage an honest and open culture which values the differences between us.
- Better reflect and understand the customers and the communities we serve to continue to deliver excellent service to our increasingly diverse customer base.
- Develop policies and practices to direct and guide the way in which we conduct ourselves and carry out our activities both within the organisation and with our external contacts which make our values and expectations clear and deliver fairness and consistency of approach while at the same time valuing individuality.
- Make sure that employees are aware of their rights and their responsibilities of the Company in relation to diversity. It is the responsibility of all employees to sustain a culture and approach that supports diversity and equal opportunities.
- Encourage all employees and external contacts to value/proactively support diversity.
- Ensure that the principle of diversity underpins the Company's organisational values, supporting the Company's key principle of focus, specialisation and service.

4. JOB DESIGN

The design of jobs, working hours and related practices can discriminate directly or indirectly against certain groups of applicants. As vacancies arise or departments are restructured, the requirements of individual jobs will be reviewed by the manager supported by the HR department. Where appropriate, jobs will be redesigned in order to ensure that they attract the broadest selection of potential recruits of suitable calibre. Where appropriate, new work patterns and flexible working will also be considered and introduced.

5. ADVERTISEMENTS

The Company will endeavour to advertise 99% of all vacancies within the Company in order to provide an opportunity for all interested persons to apply, although it reserves the right to not do this for operational/client related and confidential reasons. All external recruitment will involve for example (but not exclusively), the use of Job Centre Plus, local press, recruitment websites and agencies dependent upon the type of role being advertised. Applications will be encouraged from all suitably qualified individuals. An exception to the above applies

when special arrangements are made for the redeployment of employees who would otherwise be “at risk” of redundancy or termination of employment due to capability on health grounds. All advertisements, whether internal or external, must be approved by the HR department after discussion with the recruiting manager.

6. RECRUITMENT, TRANSFERS AND PROMOTIONS

The paper and online application processes that are used across the Company have been designed in order to obtain all the necessary information to provide the basis for an equitable and instructive recruitment and selection of applicants. We aim that personal details such as age, gender, marital status or race are not disclosed to the recruiting manager prior to the commencement of any short listing of candidates (unless these are contained within documentation provided by the employee such as a CV). This will avoid any stereotypical assumptions based on protected characteristics about who is able to do a particular job. Under UK immigration legislation, the Company is required to carry out all necessary checks to ensure applicants are eligible to work in the UK before an offer of employment is confirmed. This may include requesting relevant documents such as passport, visa and birth certificate, and examining them for authenticity. Those directly concerned with recruitment will receive training and/or support from the HR department in interviewing skills and non-discriminatory practices/equal opportunities. All appointments will be made solely on merit, regardless of protected characteristics or responsibility for dependents or Trade Union membership. The Company will not ask job applicants questions related to their health before a job offer is made unless it is necessary to establish if the applicant could perform an intrinsic function of the job role (subject to any reasonable adjustments). Please note – new employees will be asked to complete a health questionnaire, which if appropriate, will be sent to our Occupational Health Advisor (OHA). It is the responsibility of the employee to declare any health issues, failure to do this could result in disciplinary action. The Company is committed to making reasonable adjustments, where reasonably practicable to do so, for disabled employees.

7. TRAINING & DEVELOPMENT

The Company's training programmes will be designed to support equal opportunities. Steps will be made to ensure stereotyping, prejudice or any other form of discrimination is eliminated from all internal courses and also to select external courses, which also meet these requirements. The criteria for selecting employees for training opportunities must be non-discriminatory. These will be based upon the employee's merits and abilities, business needs and the availability of appropriate work-related courses. Whenever practicable, training will be arranged so that all categories of employees may attend. Employees will, where appropriate, through structured reviews and informal discussions with their managers, be able to discuss suitable development and training opportunities.

8. WORKING CONDITIONS AND TERMS OF EMPLOYMENT

The Company will try to accommodate the requirements of cultural or religious practices, and domestic responsibilities, such as caring for dependants (which could be a spouse, partner, child parent, or someone who depends on an employee for care) where reasonably practicable. The aim is to ensure that terms of employment, benefits, facilities and policies are free from unlawful discrimination, and these will be reviewed on a regular basis to ensure that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them. Decisions made under our disciplinary, capability and attendance management policies will be carried out fairly and without discrimination. As appropriate, jobs where this suits the role will be opened up to flexible working arrangements, if appropriate. The Company will also aim to design pay systems that are transparent, fair and free from discrimination.

9. REDUNDANCY & REDEPLOYMENT

With reference to the appropriate policies, the HR department will ensure that the selection for redundancy and/or redeployment is conducted in a manner which avoids any direct or indirect discrimination.

10. MONITORING AND POSITIVE ACTION

It is an aim that application information is collated by the HR department for the purpose of ethnicity, gender, disability and age in order to establish whether the Company is attracting applicants from a representative cross-section of the local community. Where the Company is aware of any particular group/s that are under-represented for no obvious reasons, it may review its recruitment sources, where appropriate, in an effort to attract applicants from under-represented groups.

11. COMMUNICATION

The details of this policy will be made available to all employees via the intranet and new employees will receive have information on the policy during their induction. The Company will, where practicable, ensure that all communication takes into account employees with known communication disabilities, literacy difficulties, or where English is not their first language. This policy will be used in regular recruitment training events.

12. ADHERENCE TO POLICY

It is the responsibility of managers/supervisors to ensure that the minimum standards established within this policy are adhered to within their area of responsibility; All employees, at every level, must:

- co-operate with any measures introduced to ensure equal opportunity;
- report any suspected discriminatory acts or practices;
- not induce or attempt to induce others to practice any discrimination;
- not victimise anyone as a result of them having reported or provided evidence of discrimination;
- not harass, abuse or intimidate others on any account;
- not canvass job applicants in an attempt to discourage them from applying or taking up a post.

Any breach of this policy will be dealt with through the Disciplinary Policy. Serious offences, such as harassment, will be dealt with as gross misconduct.

13. GRIEVANCES

Any employee who has a concern regarding the application of this policy should normally make use of the Company's Grievance Policy. Any prospective employee may request a copy of this policy and submit a grievance, which must be in writing, to the HR department within 7 days of any alleged incident. An investigation will then be conducted, and the individual will receive a written report as to the outcome.

14. RESPONSIBILITY

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions. Individual managers are responsible for ensuring that this policy is



applied within their own area. Any queries on the application or interpretation of this policy must be discussed with the HR department prior to any action being taken. The Director of HR has the responsibility for ensuring the maintenance, regular review and updating of this policy. Revisions, amendments or alterations to the policy can only be implemented following consideration and approval by the Director of HR.

15. SEXUAL HARRASSMENT

Please refer to the companies Anti Bullying and Harassment Policy held within the companies Integrated Management System.