

PS08 - EQUALITY, INCLUSION AND DIVERSITY POLICY

Equality, Inclusion and Diversity Policy Statement

The purpose of this policy is to ensure equality for all workers, job applicants and others affected by our activities and decisions, irrespective of any protected characteristics¹, which include ethnicity, colour, race or nationality; mental or physical ability, conditions or health; age; marital or civil partnership status; actual or perceived sexual orientation, gender, gender re-assignment or gender-identity; pregnancy, parental or carers responsibility; religion or belief; or trades union membership.

It is our policy to:

- (1) Respect the equal rights of all persons
- (2) Strive for inclusion and diversity in our workforce.
- (3) Comply with the Human Rights Act 1998, Equality Act 2010 and other relevant acts and regulations and subsequent amendments, and to observe as far as possible the Equality and Human Rights Commission's Codes of Practice for Employment, Equal Pay, and Services, Public Functions and Associations.
- (4) Treat all persons fairly, openly and honestly with respect and dignity.
- (5) Ensure that no person is not victimised or subjected to harassment or discrimination on the grounds outlined above.
- (6) Promote equality, inclusion and diversity, and to ensure that the talent and skills of all persons working for the company are maximised.
- (7) Make recruitment, training and promotion opportunities as widely as possible, and ensure that selection criteria are made entirely related to the job, and that outcome decisions are made purely based on merit.
- (8) Make equal pay in employment. In order to achieve this, we will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.
- (9) Make reasonable adjustments to its standard working practices to overcome barriers caused by different levels of physical or mental ability.
- (10) Investigate all allegations of victimisation, discrimination and harassment promptly and thoroughly. Where allegations are substantiated, disciplinary action shall be undertaken the results of which may include dismissal of the person(s) responsible.

We seek to fulfil this commitment to equality through the application of the below procedures.

This Policy applies to all persons working for an on behalf of the company and to all applicants for employment.

We will circulate this Equality, Inclusion and Diversity Policy to all workers by enclosing copies in induction packs.

We will train our managers in equality and the law on equality, discrimination, harassment and victimisation.

The overall responsibility for this policy and its effective implementation is held by the Group CEO, Nigel Grayston.

This policy shall be review as part of any change event, post-incident, on identification of better practice or as a minimum at least every three years.

Signed on behalf of The Bridge Group,

Nigel Grayston, Director, 01 January 2022

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PROCEDURES

1. Recruitment

- 1.1 All vacant posts within the Company will be advertised internally, whether or not they are also advertised externally. All Terms and Conditions of Employment and related benefits shall be non-discriminatory, except in cases where there is a legal requirement that the job holder is of a specified gender or where health and safety regulations apply.
- 1.2 All applicants for employment and all individuals applying for alternative positions or promotion within the Company shall be assessed according to their skills, experience and ability to do the job.
- 1.3 When vacancies are advertised, both internally and externally, we will continue to ensure that such advertising, both in placement and content, is compatible with the Terms of this Policy.
- 1.4 Advertisements will encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, we will, as far as reasonably practicable:
 - (a) Ensure advertisements are not confined to those publications which would exclude or disproportionately reduce the numbers of applicants with protected characteristics (extended list).
 - (b) Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a individuals with protected characteristics (extended list).
- 1.5 Where vacancies may be filled by promotion or transfer, they will be published to all eligible persons in such a way that they do not restrict applications from individuals with protected characteristics (extended list).
- 1.6 Internal applicants for vacancies should expect a full review of their work history, including their work performance, salary history and other information in their personnel file.
- 1.7 Employment of Family Member: The employment of members of a worker's immediate family is subject to the provisions set out below.

Family members, defined as parents, children, spouse, civil partner, siblings, grandparents and those same relationships engendered by in-laws, adoptions, civil partnerships, guardianships and stepfamilies, may be workers of the Company as long as their employment does not create an inappropriate work relationship. This applies whether the relationship exists at the time of employment or subsequent to employment.

An inappropriate work relationship results when family members are employed:

- In the same workgroup.
 - In direct or indirect Supervisor / Subordinate relationship.
 - Where there is a strong possibility of interaction of job duties.
 - In a business area where control / audit over the work of that business area is the responsibility of an immediate family member working in another business area.
- 2.4 All employment decisions, job assignments, transfers and promotions are to be consistent with this Equality, Inclusion and Diversity Policy.

2 Training and Development

- 2.1 Equal consideration will be given to all individuals for training opportunities, both to perform their job and to develop personally.
- 2.2 Individuals will be appraised against relevant, objective criteria to measure performance and training needs.
- 2.3 Promotion prospects will be governed by individual merit, ability, achievement and development potential.

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- 2.4 It is a condition of employment that Individuals attend the required induction/ training / educational courses.
- 2.5 The company will train, develop and promote on the basis of merit and ability only.
- 2.6 Any training needs or other training issues arising in or from the appraisal shall be recorded on a Training Plan.
- 2.7 The company reserves the right to require a contractually binding agreement for the payment of training, which may include repayment term should the individual leave the company's employment within a defined timeframe.
- 2.8 For contracted workers suitable agreement may be made between the company and the individual to deduct the cost of training administered and paid for by the company from the individuals pay.
- 2.9 Increases in remuneration package are not automatic and will depend on the Company's business situation and industry outlook, as well as on your individual performance. It must also be recognised that should your overall remuneration package be increased, this may be through enhanced benefits rather than or as well as an increase in salary.
- 2.10 We will train all Directors and Managers in the Company's Policy on Equality, Inclusion and Diversity and help them identify discriminatory acts, practices or acts of harassment or bullying. Managers will be responsible for ensuring they actively promote equality, inclusion and diversity within the business areas for which they are responsible.
- 2.11 We will also provide awareness to all persons working for the company to help them understand their rights and responsibilities, including awareness of the rights of other, in relation to dignity at work and what they can do to create a work environment that is free from bullying and harassment.

3 Employment Verification

- 3.1 We will provide information to prospective external Employers and others regarding any dates of employment and positions held. We will also verify the accuracy of salary information released by the employed individual. Individuals should refer those persons seeking employment verification to the Compliance Manager.

4 Reasonable Adjustments for Alternative Needs

- 4.1 For employees with specific physical or mental ability or health needs, or with carers responsibilities, we will reasonable adjustments to work provisions, criteria or practices, or to work premises in order to ensure that the individual is not placed at a substantial disadvantage in comparison with other persons.

5 Victimisation, Harassment and Bullying

- 5.1 The company will not tolerate any form of victimisation, harassment or bullying. Victimisation, harassment and bullying includes but is not limited to been forced to undertake work that the individual does not feel capable of doing, physical attack, excessive verbal attack, demeaning remarks meant to take offence, provision of different working conditions with the intention of disadvantage the individual, unreasonable out-of-hours contact beyond contractual requirements, wolf-whistling or cat calling, or other similar activity.
- 5.2 Should any individual, be they be employed by the company or a third party eg client, member of the public, make a claim of bullying or harassment then this shall be dealt with as per 7. Discrimination Grievances below.

6 Monitoring

- 6.1 The implementation of the Equality, Inclusion and Diversity Policy shall be reviewed periodically and progress in achieving its objectives reviewed. Where barriers to equality are identified, any necessary changes will be made to this Policy.

7 Discrimination Grievances and Investigation Process

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- 7.1 If any person, working on behalf of the company or not, (defined as “the aggrieved party”) believes that they have been subjected to direct or indirect discrimination, they should invoke the Company’s Grievance Procedure as per below.
- 7.2 The aggrieved party should in the first instance approach the line manager however where the grievance involves t/he line manager or the aggrieved party feel that the line manager may not be impartial, the aggrieved party may escalate the grievance to the Managing Director.
- 7.3 The manager / director receiving the grievance shall conduct a suitable and adequate investigation including necessary interviews and receipt of any witness statements or other evidence. Where required the manager / director may appoint an independent person to undertake this investigation. The investigation shall be undertaken in a timely manner. Suitable records shall be produced and maintained.
- 7.4 The investigation shall determine if the grievance is upheld and if any necessary disciplinary action or other improvement actions are required. Determined actions shall be implemented in a timely manner.
- 7.5 At all stages of the grievance process the aggrieved party shall be reasonably informed of the status of the investigation and of any actions.
- 7.6 The company supports the rights of individuals to implement the Whistleblowing Policy, including for escalation to external parties, where the aggrieved individual does not believe that the company has fully implemented its duty of care.
- 7.7 In all cases, all matters shall be treated as strictly confidential.

END

Policy Note 1: The protected characteristics recognised by the company are an extended list to those in the Equality Act 2010.

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Date: 01 January 2022

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