



## Equality & Diversity Policy

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## Section 1

### **Commitment to providing Equality of Opportunity and Diversity within Medex**

**At Medex Group we want to develop a culture where ideas flourish, and energies are unleashed. We believe this is achieved by bringing together a rich mix of people, with differing perspectives and from different backgrounds.**

Medex Group is committed to building a diverse and socially inclusive workforce that is responsive and appropriate to all our service users. By embracing difference in terms of people, skills and cultures we can develop our creative thinking and arrive at winning solutions. We believe that 'talent' should be positively exploited, and people deliver their best when they feel valued, their opinions are welcomed and acted upon, they are included and when their needs are recognised.

Medex Group will accept no less than an environment that provides equality of opportunity, respects and protects the dignity of individuals and is free from discrimination, harassment, victimisation or bullying of any kind.

In practice, this means that Medex Group will make every effort to ensure that there is no harassment or unjustified discrimination on the grounds of race, nationality, religious belief, ethnic origin, disability, age, gender or marital status, civil partnership, sexual orientation, employment status or family status in the way that the company treats its employees, clients, workers, visitors and other people working on behalf of Medex (for example contractors, placement providers, consultants, free-lancers, agency workers, hereafter referred to as staff and clients).

Medex Group recognises its legal obligations including those under the Race Relations Act, the Sex Discrimination Act, the Civil Partnership Act, the Equal Pay Act, the Disability Discrimination Act, the Part-time and Fixed-term Workers legislation and the Employment Equality (Sexual Orientation) and (Religion or Belief) Regulations, and the Employment Equality (Age) Regulations.

Medex Group will take positive steps to remove barriers to achieving a diverse workforce and actively encourage practices that provide for a flexible and open-minded approach to employing, developing and retaining individuals, regardless of their backgrounds.

This policy therefore applies to all aspects of the company's working practices including the recruitment and selection of employees, terms and conditions of employment, training, salary, work allocation, promotion and disciplinary procedures.

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## Section 2

### Responsibilities

The Managing Director is responsible for ensuring this policy is current and effectively meets the requirements of the company. The Managing Director is responsible for ensuring this policy is reviewed regularly and updated where it has been identified that the company can improve its performance in equality of opportunity and diversity.

All Medex Group staff and clients have a responsibility to ensure that they do not ignore, trivialise or condone discrimination, harassment, victimisation and bullying by others of any kind and to ensure their own conduct conforms to the expected standards and reflects this Policy document.

Unfair discrimination, harassment, bullying or victimisation brings about a climate of fear, insecurity and poor work performance. As well as being unlawful it affects profitability and morale. It is, therefore, vital that every employee understands his/her responsibilities.

Managers' responsibilities - Line managers have a responsibility to ensure that:

- ? All employees are treated fairly and equally.
- ? The dignity of employees is protected.
- ? Your team can compete effectively and deliver to your customers' expectations. You are more likely to be able to do this with a diverse team, from different backgrounds and with different experiences.
- ? Your employees are aware of the standards of practice and behaviour expected of them.
- ? You act as a role model in adopting good standards.
- ? You do not in any way condone harassment, bullying or victimisation.
- ? You keep factual notes about any incidents.
- ? Complaints about harassment are dealt with sympathetically, promptly, in confidence and thoroughly investigated in line with the formal grievance procedure for dealing with issues of a sensitive nature.
- ? You treat any complaint with impartiality.
- ? You ensure your staff have a safe, healthy and productive working environment free from harassment and victimisation and to provide employees with the support and resources to do their jobs.
- ? You identify and provide any adaptations and special equipment, as far as reasonably practicable, to those who become disabled whilst employed.
- ? Once a complaint has been raised, the member of staff is free from victimisation.
- ? You recruit and promote and make available opportunities for training and career progression in accordance with Medex Group's policy.

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### Individual responsibilities

**No** one in Medex Group should:

- ? Harass those with whom they work directly or come into contact with in the course of their work.
- ? Condone or assist others, whether or not they work for Medex, to commit harassment.
- ? Ignore instances of harassment.
- ? Instigate or pass on malicious rumours and gossip.
- ? Victimise someone for making a complaint.

If a client or colleague makes a complaint to you, you must ensure it is dealt with sensitively and promptly by following the Medex Complaints Procedure.

### Human Resources

- ? The Managing Director will undertake regular monitoring of ethnicity, disability, gender and age of staff. This information will only be used in an anonymous form for statistical purposes. (See monitoring section)
- ? If someone feels uncomfortable in approaching their line manager, they are encouraged to contact the Managing Director to discuss any concerns or to make a complaint.
- ? Anyone who receives a complaint should promptly inform the Quality Manager who will monitor all complaints to ensure they are dealt with promptly, effectively and fairly.
- ? The Managing Director is available for advice and guidance about dealing with complaints at any time.
- ? Medex Group strives to make everyone's job attainable, and the Managing Director is happy to discuss requests for additional resources, such as equipment, to assist in all working practices.
- ? The Managing Director will act on equal opportunities issues with health and safety implications, which have been referred to them by the Managing Director & Line Management.

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### Section 3

#### Dealing with Complaints

All allegations of discrimination, harassment, bullying or victimisation are taken seriously and will be dealt with quickly and sensitively.

Often the person subjected to such treatment is reluctant to complain. They may be too embarrassed or unsure how to make a complaint or are worried that others may think it trivial. They may not want attention focussed on the situation, so they suffer in silence.

In some cases it may be possible to rectify matters informally. Sometimes people are not aware that their behaviour is unwelcome, and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease.

It may be that the individuals will choose to do this themselves, or they may need support from the Managing Director, a manager or a colleague. Don't suffer or let others suffer in silence. The formal Medex Group grievance procedure is open to staff who require support in resolving alleged discrimination, harassment, bullying or victimisation. The grievance procedure provides guidance on how to raise a complaint.

Everyone has the right to complain about bullying, harassment, victimisation and discrimination and to have any complaint dealt with fairly, thoroughly, confidentially, sensitively and quickly.

Discrimination, harassment, victimisation or bullying at any work-related social, training and development event or occasion is no more acceptable than it is during the course of normal work activity. Any such conduct by people outside Medex, with whom Medex staff and clients are in contact as part of their work, is also treated seriously and investigated promptly.

Anyone who believes that they may have been subjected to treatment which breaches this policy, may raise the matter either informally or through Medex Group's formal Grievance Procedure for dealing with issues of a sensitive nature and can expect to be treated sympathetically and not be subject to victimisation.

Diversity and Equality of Opportunity is taken very seriously by Medex Group and wilful failure to apply this policy or evidence of discrimination, harassment, bullying or victimisation will result in disciplinary action that may include dismissal.

Medex Group expects all its employees, clients, and other stakeholders to observe the requirements of this Policy and managers will ensure their continued compliance.

In addition to internal action by Medex Group, someone found to be harassing another may also be liable to legal action against him or her as an individual.

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For further information in relation to Disciplinary and Grievance procedures please see Staff Handbook.

## Section 4

### Policy Measures

#### Recruitment and Selection

Diversity and equality of opportunity is central to the Medex Group recruitment and selection process. This practice extends to all employees applying for promotion and/or career development.

Our line managers and those involved in the decision making process are all trained on diversity and equal opportunities in recruitment and selection.

We recognise that by applying a systematic and fair set of selection criteria without any pre-existing judgements and/or bias when filling vacancies, we maximise our ability to select the best candidate(s) for the job role(s).

We utilise a variety of recruitment methods, including national and local press, local Job Centres, web based advertising and recruitment agents. Our job advertisements aim to encourage applications from all candidates, and we regularly monitor content of job profiles, person specifications and internal advertisements to ensure that they do not perpetuate in any way any existing imbalance in our workforce relating to age, gender, disability, race, religious belief and sexual orientation.

We regularly review the content of our application forms to ensure that the information required is relevant and without bias. Any CV's or applications received are reviewed against the requirements of the job role only. Where an individual is unable to complete a CV or application form, we will endeavour to assess their eligibility for selection by other methods.

Our selection methods reflect fully our approach to Diversity, and we ensure that all our methods for selection assess merits in terms of the required skills and behaviours for the job role.

We ensure that every care is taken when interviewing candidates, to enable individuals with a disability to attend for selection.

Medex Group is 'Positive about disabled' and committed to interviewing all applicants with a disability who meet the minimum criteria for a job vacancy.

When a disabled applicant is successful in their job application and is offered employment, Medex will make every effort to make such adjustments as are reasonably necessary and practicable to ensure their retention in the business.

Medex Group have a published policy statement and briefing document in respect of its commitment to employing and providing services to people with disabilities. All employees are expected to have read this policy and ensure compliance with its principles and guidance.

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## Training & Development

Medex Group provides training for all its staff to raise awareness of diversity and equality of opportunity issues.

Medex Group will ensure that all employees receive a copy and understand the content and application of this policy.

At Medex Group we want to help our staff maximise their individual potential, all our employees have access to training regardless of their working arrangement.

All new employees will attend a thorough induction programme that will cover their responsibilities as employees, the company's responsibilities to them in respect of all aspects of their employment, training, development, promotion opportunities, equal treatment and health and safety. All of the company's policies and procedures will be covered during the programme.

We endeavour to create a learning environment in which all employees feel comfortable regardless of their race, nationality, religious belief, ethnic origin, disability, age, gender or marital status, sexual orientation, employment status or family status.

We facilitate regular appraisal and development reviews where all parties are encouraged to provide constructive feedback and evaluation based upon skills and behaviours assessment.

## Promotion opportunities

Career progression is something we take very seriously at Medex Group, we want our employees to develop their skills and stay with the organisation. We encourage employee retention by openly advertising all vacancies internally. We will ensure that all employees have equal access to promotional opportunities. We will assess all applications for promotion on merit and will follow a thorough selection procedure in line with our recruitment process.

## Employee Communication

Medex Group will ensure that all forms of Company communication, for example e-mail and faxes, will not contain material that may offend employees within the context of this Diversity Policy.

Medex undertakes to distribute and publicise this policy statement to all current staff and to new starters on induction.

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## Facilities

Whenever reasonably practicable to do so, Medex Group will install in existing premises facilities for people with disabilities. Whenever Medex Group invests capital in new or refurbished premises every practicable effort will be made to provide for the needs of staff and customers with disabilities.

If an existing employee becomes disabled, Medex Group will make every effort to retain him or her within the workforce whenever reasonable and practicable.

## Section 5

### Monitoring

The Managing Director and team of Managers will review key management information for discussion and review of this policy. No individual will be named in the report. The report will monitor sex, ethnicity, perceived disability, grade, payment and age statistics throughout the organisation.

Medex Group will review its Diversity Policy in accordance with the results shown by the monitoring. If changes are required, Medex will implement them through the implementation of a positive action plan.

Medex Group will obtain workforce metrics and compare them with sector and best practice organisations.

Medex Group will periodically review all current recruitment, promotion and training practices to ensure the business is maximising its potential for talent by reaching the full spectrum of possible candidates/employees.

All Medex Group monitoring procedures will ensure that the information required is clearly identified and relevant to the aims of this policy and does not infringe the Data Protection Act 2018.

All information will be regularly reviewed in order that the company is ensuring that it is meeting its intended purpose.

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## Appendices

### Appendix 1: Medex Group Policy statement on harassment at work.

Medex Group believes that the dignity of every person must be respected. Harassment of staff, visitors or clients is unacceptable and will be treated seriously. The highest standards of conduct are required of everyone regardless of seniority.

Medex Group recognises that harassment may take many forms. It may be directed towards persons of either sex. It may relate to a person's ethnic origin, religion or belief, age, sex, sexual orientation, physical or mental attributes or some other personal characteristic.

Harassment may involve action or inaction, behaviour, exclusion, comment or physical contact that the recipient finds objectionable or offensive. It may result in the recipient feeling threatened, humiliated, intimidated, patronised, demoralised or less confident in their ability. Condoning such conduct may be harassment in itself. The test of harassment is, at least in part, subjective.

Harassment includes any form of behaviour that could harm or upset anyone. It can manifest in different ways to different people. Examples of unacceptable conduct include:-

- ❓ verbal abuse, or insulting behaviour.
- ❓ sexist or racist jokes, jokes about an individual's sexual orientation or jokes about an individual's physical or mental attributes.
- ❓ the display or circulation of sexually suggestive or racially abusive material.
- ❓ bullying, coercive or threatening behaviour.
- ❓ the ridicule or exclusion of an individual for cultural or religious differences, on the grounds of sex or sexual orientation or on the grounds of disability.
- ❓ unsolicited or unwelcome sexual advances, including touching, staring or commenting.
- ❓ comments of a sexual nature about a person's appearance or dress.
- ❓ any conduct, whether or not of a sexual nature, which has the purpose or effect of intimidating, degrading, humiliating or offending someone simply because he/she is of a particular sex.
- ❓ treating someone unfavourably because they have rejected or submitted to unwelcome conduct of a sexual nature or to harassment on the grounds of their sex.

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Harassment, particularly on the grounds of sex, sexual orientation, race, disability, religion or belief, will be regarded as gross misconduct for disciplinary purposes. Staff who are found to have been responsible for harassment run a serious risk of summary dismissal.

Equally, an allegation of harassment must not be made lightly. If it is found that an allegation of harassment has been made without foundation and maliciously then this will also be regarded as gross misconduct for disciplinary purposes.

Complaints of harassment can in some circumstances be dealt with informally, or if this is not appropriate, complaints should be dealt with under the Grievance Procedure for dealing with issues of a sensitive nature.

## **Appendix 2: Practical guidance to ensuring we meet our responsibilities as managers.**

### Recruitment

- ❓ Be clear what the job entails and what the key duties are.
- ❓ Advertise a vacancy openly, as this will help you attract better applicants – don't simply rely on the friends and family of current employees.
- ❓ Where reasonable to do so, adapt your methods of recruitment so that disabled people can apply and attend for interview.
- ❓ If you use a recruitment agency, make sure you do not ask them to act unlawfully.
- ❓ Ask applicants for information that will tell you they can do the job.
- ❓ If you are not doing the recruitment yourself, keep track of what's happening.
- ❓ Don't ask questions unrelated to the job – get the facts and be open-minded.
- ❓ Focus on abilities and aptitudes, not stereotypes and irrelevant characteristics. Making judgments about individuals based on their sex is not only against the law but limits your chances of finding the right person.
- ❓ Don't limit your pool. Recruitment and selection practices that deny men or women their fair chance immediately reduces by half the likelihood of finding able candidates.
- ❓ Take notes throughout the entire process. Candidates often ask for feedback, and you will have to justify your actions and decisions if you are ever called to an employment tribunal.
- ❓ Don't make assumptions about who won't 'fit in'.
- ❓ Ensure starting pay is set fairly and equitably.

### Flexible working

Medex Group believes that the promotion of flexible working can increase staff motivation, promote work-life balance, reduce employee stress and improve performance and productivity.

It is the Company's policy to endeavour to be flexible on working patterns for all employees, not just those who have the statutory right to submit such requests. Nevertheless, precedence will be given to employees who have the statutory right to request flexible working in order to ensure that the Company is complying with its legal obligations.

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As a line manager you should take all reasonable steps to accommodate an employee's request for flexible working in line with the company's guidelines on flexible working.

Each request should be dealt with individually, taking into account the likely effects that the proposed changes to working hours or place of work are likely to have on the Company, the work and customer commitments of the department in which the employee making the request is employed and the employee's colleagues. Agreeing to one employee's request will not therefore set a precedent or create a right for another employee to be granted a similar change to his/her working pattern.

### Appraisal/Performance Development Planning

Performance Development Planning is most successful when both line managers and employees share accountability for the process. As a manager, you should actively demonstrate to your staff your commitment to making the process a success.

Appraisal and performance reviews must be free from subjectivity and prejudice and should be used as an opportunity to engage in an open and two-way dialogue in respect of an individual's performance against objective and defined outputs and standards. The company has published Appraisal guidelines to support managers through the process.

### Gender Reassignment

Employing an individual that has *gender dysphoria* may present sensitive issues that require careful management. As their manager, you will need to ensure respect for the individual's dignity at work. You may need to manage the transition process with colleagues and customers.

- ❓ It is important to respect confidentiality if an individual has disclosed details of their previous identity to you, for example, in their references. Revealing information of this nature to others is an infringement of privacy and legal rights. Access to past records should therefore be restricted to staff who require the information.
- ❓ If the employee you manage is to undergo the transition process, you should discuss how to handle the process with them.
- ❓ Get support. Your Managing Director can make the necessary arrangements regarding changes to personal records as well as advise you on handling other situations, such as dress codes. The Managing Director will also be able to give you support to help you manage the situation with your staff.
- ❓ An employee who is undergoing, or has undergone gender reassignment may face prejudice, discrimination and harassment from other employees. As a manager, you will need to ensure that your staff adopt professional standards of behaviour at all times.
- ❓ Where discrimination, prejudice and harassment arise, such as name-calling, being ostracised and talked about, being asked about their private life, it should be dealt with in line with the Company's grievance procedure.

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## Training & Development

As managers you have a responsibility to ensure that you encourage opportunities for employees to develop and grow in terms of their skills, experience, and career aspirations. You should have an 'inclusive' approach to the provision of opportunities which allows access by all employees, regardless of their race, nationality, religious belief, ethnic origin, disability, age, gender or marital status, sexual orientation, employment status or family status.

The following guidance should help you to meet your responsibilities:

- ❓ Adopt a fair and consistent approach in the provision of training and development opportunities.
- ❓ Don't make assumptions in respect of the aspirations of individuals because of their race, nationality, religious belief, ethnic origin, disability, age, gender or marital status, sexual orientation, employment status or family status. Just because an employee is part-time does not mean they do not have ambition or a desire to develop new skills and take on additional responsibilities.
- ❓ Ensure that the method of training is suitable for all individuals and takes account of individual circumstances e.g. where an individual has a disability which may require a modified approach to the training method, or where a part-time employee has child-care arrangements in place and may need a flexible approach to the delivery of the training.
- ❓ Ask for help: your Managing Director is on hand to support you in the establishment of a training and development process.