



BLCP0037

Equality, Diversity & Inclusion Policy

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1.0	January 2021	Emily Weir, HR Business Partner		First issue.
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3.0	3 July 2025	Emily McWhinnie, HR Business Partner	2 March 2025	Addition of sections 5, 6, 9 and 10. Entered onto new template.

Related documents

Document Number	Document Name	File Location
BLCP0036	Bullying and Harassment Policy	MS Teams - DMS
BLCP0029	Disciplinary Policy	MS Teams - DMS

Contents

1.	Purpose	4
2.	Scope	4
3.	Key Principles	4
4.	Equal Opportunity Policy Statements	5
5.	Discrimination	7
6.	Recruitment and Selection	8
7.	Part-Time and Fixed Time Work	9
8.	Equal Pay	9
9.	Disabilities	9
10.	Breaches of this Policy	10
11.	Training	10
12.	Communication	11
13.	Review	11

1. Purpose

- 1.1. The purpose of this policy is to make clear BlueLight Commercial's pledge to:
 - 1.1.1. Provide equality, fairness and respect for all who work for the organisation, whether employed, seconded or contracted;
 - 1.1.2. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation;
 - 1.1.3. Oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training and other development opportunities; and
 - 1.1.4. Ensure that no person is victimised or subjected to any form of bullying or harassment.

2. Scope

- 2.1. This policy applies to:
 - 2.1.1. All employees of BlueLight Commercial
 - 2.1.2. Seconded to BlueLight Commercial.
 - 2.1.3. Volunteers in BlueLight Commercial.
 - 2.1.4. People working within BlueLight Commercial in any third-party capacity.

3. Key Principles

- 3.1. BlueLight Commercial Commits to:
 - 3.1.1. Encouraging equality, diversity and inclusion in the workplace;
 - 3.1.2. Creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and contributions are recognised and valued.
 - 3.1.3. This commitment includes training all of those who work for BlueLight Commercial about their rights and responsibilities under the equality, diversity and inclusion policy.
 - 3.1.4. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and preventing bullying, harassment, victimisation and unlawful discrimination.

- 3.1.5. All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.
- 3.1.6. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, the public and others in the course of BlueLight Commercial's work activities.
- 3.1.7. Such acts will be dealt with in line with the Bullying and Harassment Policy and the grievance procedure, appropriate action will be taken.
- 3.1.8. Make opportunities for training, development and progression available to all staff, who will be supported and encouraged to develop their full potential, so that their talents and resources can be fully utilised to maximise the efficiency of BlueLight Commercial.
- 3.1.9. Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- 3.1.10. Review employment practices and procedures when necessary to ensure fairness, and also update them and the policies to take account of changes in the law.
- 3.1.11. Monitor the make-up of the workforce regarding data such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this policy.
- 3.1.12. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan/s, are working in practice, reviewing them and considering taking action to address any issues.

4. Equal Opportunity Policy Statements

4.1. Age

- 4.1.1. BlueLight Commercial will:
 - 4.1.1.1. Ensure that people of all ages are treated with respect and dignity;
 - 4.1.1.2. Ensure that people are given equal access to our employment, training, development and promotion opportunities;
 - 4.1.1.3. Challenge discriminatory assumptions about younger and older people; and
 - 4.1.1.4. Seek to continue to improve access to information
- 4.1.2. If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

4.2. Race

4.2.1. BlueLight Commercial will:

- 4.2.1.1. Challenge racism wherever it occurs;
- 4.2.1.2. Respond swiftly and sensitively to racist incidents;
- 4.2.1.3. Actively promote race equality and inclusion in BlueLight Commercial;
- 4.2.1.4. Take positive action to redress the negative effects of discrimination against everyone;
- 4.2.1.5. Take positive action to redress the negative effects of discrimination against everyone; and
- 4.2.1.6. Offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same.

4.3. Gender

4.3.1. BlueLight Commercial will:

- 4.3.1.1. Challenge discriminatory assumptions about gender;
- 4.3.1.2. Take positive action to redress the negative effects of discrimination against everyone;
- 4.3.1.3. Offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same; and
- 4.3.1.4. Provide support to prevent discrimination against transgender people who have or who are about to undergo gender reassignment.

4.4. Sexual Orientation

4.4.1. BlueLight Commercial will:

- 4.4.1.1. Ensure that we take account of the needs of everyone, including the LGBTQ+ communities;
- 4.4.1.2. Promote positive images of the LGBTQ+ communities;
- 4.4.1.3. Challenge discriminatory assumptions about the LGBTQ+ communities;
- 4.4.1.4. Take positive action to redress the negative effects of discrimination against everyone; and
- 4.4.1.5. Offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same.

4.5. Religion or Belief

4.5.1. BlueLight Commercial will:

4.5.1.1. Ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and

4.5.1.2. Respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

4.6. **Pregnancy or Maternity**

4.6.1. BlueLight Commercial will:

4.6.1.1. Ensure that people are treated with respect and dignity during pregnancy or maternity leave;

4.6.1.2. Challenge discriminatory assumptions about pregnancy or maternity; and

4.6.1.3. 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.

4.7. **Marriage or Civil Partnership**

4.7.1. BlueLight Commercial will:

4.7.1.1. Ensure that people are treated with respect and dignity regardless of marriage or civil partnership status;

4.7.1.2. Challenge discriminatory assumptions about the marriage or civil partnership of our employees; and

4.7.1.3. Ensure that no individual is disadvantaged as a result of their marriage or civil partnership status.

5. **Discrimination**

5.1. You must not unlawfully discriminate against or harass other people, including current and former staff, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.

5.2. The following forms of discrimination are prohibited under this policy and are unlawful:

5.2.1. **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a Protected Characteristic, and perception discrimination, where a person is treated

less favourably because of the mistaken belief that they possess a Protected Characteristic.

- 5.2.2. **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- 5.2.3. **Harassment:** this is dealt with in our Anti-Harassment and Bullying Policy.
- 5.2.4. **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.
- 5.2.5. **Disability Discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

6. Recruitment and Selection

- 6.1. Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, BlueLight Commercial will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Shortlisting and interviewing should be done by more than one person and with the involvement of the HR Department, where possible. BlueLight Commercial's recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.
- 6.2. Vacancies should generally be advertised to a diverse section of the labour market by using a variety of social media channels as well as using recruitment agencies which provide a diverse range of suitable candidates. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.
- 6.3. Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 6.4. Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the HR Department. For example:
 - 6.4.1. Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).

- 6.4.2. Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- 6.4.3. Positive action to recruit disabled persons.
- 6.4.4. Equal opportunities monitoring (which will not form part of the selection or decision-making process).
- 6.5. Where necessary, job offers can be made conditional on a satisfactory medical check.
- 6.6. BlueLight Commercial is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the HR Department or UK Visas and Immigration.
- 6.7. To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, BlueLight Commercial may monitor applicants' ethnic group, nationality, gender, gender identity, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy and in accordance with data protection legislation.

7. Part-Time and Fixed Time Work

- 7.1. 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.

8. Equal Pay

- 8.1. BlueLight Commercial 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.

9. Disabilities

- 9.1. If you are disabled or become disabled, BlueLight Commercial encourages you to tell us about your condition so that we can support you as appropriate.
- 9.2. If you experience difficulties at work because of your disability, you may wish to contact your line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager may wish to consult with you

and your medical adviser about possible adjustments. BlueLight Commercial will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, BlueLight Commercial will explain our reasons and try to find an alternative solution where possible.

- 9.3. BlueLight Commercial will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, BlueLight Commercial will take reasonable steps to improve access.

10. Breaches of this Policy

- 10.1. BlueLight Commercial takes a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.
- 10.2. If you believe that you have suffered harassment, bullying or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter through our Grievance Procedure and through our Anti-harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- 10.3. There must be no victimisation or retaliation against staff who complain about or report discrimination. If you believe you have been victimised for making a complaint or report of discrimination or have witnessed it happening to someone else in the workplace, you should raise this through the Grievance Procedure.
- 10.4. BlueLight Commercial encourages the reporting of all types of potential discrimination, as this assists us in ensuring that diversity, equity and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.

11. Training

- 11.1. Policies will be accessible to all staff via the intranet. These documents can be reviewed at any time and will remain available throughout your employment. Familiarise yourself with this policy by reading through the policy as part of your ongoing self-training. If you have any accessibility issues, please contact HR for assistance.
- 11.2. Additional training if required/requested will be provided as necessary.
- 11.3. Annual refresher training may be provided
- 11.4. All training needs will be identified through regular appraisals which will be based entirely on an objective assessment of performance and will not be influenced by

any Protected Characteristics that you may have. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

12. Communication

- 12.1. The following methods will be adopted to ensure full knowledge of the policy:
 - 12.1.1. The policy will be published in the Document Management System (DMS), accessible through MS Teams or through the intranet.
 - 12.1.2. Any associated procedure or process will be published in the Document Management System (DMS), accessible through MS Teams or through the intranet.
 - 12.1.3. Any updates to the policy will be communicated by HR via email or via the staff Weekly Bulletin.

13. Review

- 13.1. As part of BlueLight Commercial's commitment to maintaining up-to-date and effective policies, this policy will be reviewed bi-annually or more frequently as required. This may include changes in employment law, business, operations, or other relevant factors. The goal is to ensure that the policy continues to fulfil its purpose.
- 13.2. Comments or suggestions regarding the policy are invited from users and should be directed to the Responsible Officer for consideration.
- 13.3. The Responsible Officer is responsible for keeping this policy up to date.
- 13.4. BlueLight Commercial reserves the right to amend the policy at any time.



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