

This Diversity and Inclusion Policy is made on the Third day of February 2024

Between

[DOLLY SHOP LTD]

And:

[EMPLOYEES, WORKERS, CONTRACTORS, OR JOB APPLICANTS]

### Parties

[DOLLY SHOP LTD], a company incorporated in the United Kingdom with company number 1368255 and having its registered office at The Coach House, 2 Upper York Street Unit 30, Bristol BS2 8QN

The [EMPLOYEES/WORKERS/CONTRACTORS/JOB APPLICANTS] as defined below.

1. For the purposes of this Policy:
2. "Employees" means all individuals who have entered into or work under a contract of employment with the Company.
3. "Workers" means all individuals who have entered into or work under a contract to personally carry out work or services for the Company.
4. "Contractors" means all individuals who have entered into a contract to carry out work or services for the Company but are not Employees or Workers.
5. "Job Applicants" means all individuals who apply or express interest in working for the Company whether as Employees, Workers or Contractors.

### Background and Definitions

This Diversity and Inclusion Policy ("Policy") has been produced to comply with the Equality Act 2010 ("Act"). The Act protects [EMPLOYEES/WORKERS/CONTRACTORS/JOB APPLICANTS] against discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

1. The purpose of this Policy is to promote diversity and inclusion in the workplace. Diversity recognises and values differences between individuals such as backgrounds, experiences and perspectives. Inclusion creates a culture that embraces differences and provides a sense of belonging for all.
2. A diverse and inclusive workforce provides significant benefits including access to a wider talent pool, improved creativity and innovation, better decision making and an enhanced reputation as an employer of choice.

This Policy applies to all aspects of employment and engagement at [DOLLY SHOP LTD] including recruitment, pay and benefits, training, promotion and work environment. It also applies to our treatment of customers, clients and other third parties.

All managers and [EMPLOYEES/WORKERS/CONTRACTORS/JOB APPLICANTS] have a responsibility to adhere to and promote this, Policy. The [DIRECTOR] has overall responsibility for ensuring compliance.

1. Equal Opportunities Policy
	1. **Diversity** means having a workforce that represents a variety of backgrounds, perspectives, experiences, races, religions, nationalities, ethnicities, ages, disabilities, sexual orientations, gender identities, and family statuses.

**Inclusion** means the achievement of a work environment in which all individuals are treated fairly and respectfully, have equal access to opportunities and resources and can contribute fully to the success of [DOLLY SHOP LTD].

* 1. **Equal opportunities** means ensuring individuals are treated fairly and equally and not discriminated against on the basis of **protected characteristics**.
	2. **Protected characteristics** are defined in the Equality Act 2010 as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
	3. **Direct discrimination** means less favourable treatment of a person compared to another because of a protected characteristic.
	4. **Indirect discrimination** means the application of a provision, criterion or practice which disadvantages people who share a protected characteristic.
	5. **Harassment** means unwanted conduct related to a protected characteristic which violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
	6. **Victimisation** means subjecting someone to a detriment because they have made or supported a complaint about discrimination or harassment.
1. Anti-Harassment Policy

Harassment is unacceptable. [DOLLY SHOP LTD] will not tolerate harassment related to any protected characteristic.

* 1. Harassment is defined as unwanted conduct that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
	2. Examples of harassment include:
		1. Unwanted conduct such as touching, leering, comments, jokes or insults related to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.
		2. Verbal abuse, insensitive jokes or pranks, offensive emails/messages.
		3. Intimidation, isolation or exclusion from social activities.

All [EMPLOYEES/WORKERS/CONTRACTORS/JOB APPLICANTS] are responsible for their own behaviour and conduct and must ensure they do not harass others.

* 1. Informal resolution is usually encouraged as the most effective way to deal with complaints. An individual who feels they are being harassed should clearly explain to the alleged harasser that the behaviour is unacceptable.

If informal resolution is not possible or appropriate, the complainant should make a formal written complaint to the Managing Director as soon as possible.

Upon receiving a formal complaint, the Managing Director will appoint an independent investigator to carry out an investigation in a timely, sensitive and confidential manner. Both parties will have the opportunity to state their case.

* 1. If the investigation concludes harassment has occurred, the harasser will be subject to disciplinary action up to and including dismissal.

[DOLLY SHOP LTD] will not victimise anyone for making or supporting a complaint in good faith even if it is not upheld. Any such victimisation will be treated as a disciplinary offence.

1. Reasonable Adjustments

[DOLLY SHOP LTD] will consider all reasonable adjustments to the physical features of the premises or physical aids to assist disabled employees/applicants.

* + 1. This could include making reasonable adjustments to things like ramps, adjusted seating arrangements, and appropriate lighting.

[DOLLY SHOP LTD] will consider all reasonable adjustments to working practices or policies to accommodate the needs of disabled employees/applicants.

* + 1. This could include adjusted working hours, use of special equipment, and reallocation of minor duties.

[DOLLY SHOP LTD] will consider all reasonable adjustments to provide auxiliary aids to assist disabled employees/applicants.

* + 1. This could include providing information in alternative formats like Braille, audio or large print versions.

Any employee/applicant who requires an adjustment should make a request to the Personal Assistant

* + 1. The request will be considered promptly and an adjustment implemented, where reasonable, within a 2-24 hour timeframe
	1. All medical information and any other information disclosed as part of a request for adjustment will be treated as confidential.
1. Recruitment and Selection
	1. Advertising vacancies. All job vacancies will be advertised to encourage applications from all sections of the community and to promote equal opportunities in employment. Job advertisements will be drafted clearly and will contain only requirements that are necessary and justifiable for the effective performance of the role.
	2. Application process. All applications will be processed in the same way against pre-determined criteria. Where possible, CV blind recruitment techniques will be used. Reasonable adjustments will be made to allow applicants with disabilities to compete on an equal basis.
	3. Shortlisting. Shortlisting will be carried out by more than one person where possible. Shortlisting criteria will relate only to the requirements of the role as set out in the job description and person specification.
	4. Interviews. Where possible, more than one interviewer will be involved in the interview process. The same interview questions and assessment criteria will be used for each candidate. Reasonable adjustments will be made for candidates with disabilities.
	5. Selection. The most suitable candidate will be appointed based solely on their abilities and individual merit as measured against the person specification and selection criteria. Offers of employment will be made conditional on standard pre-employment checks.
	6. Monitoring. Applicants may be asked to provide diversity monitoring data but completion will be voluntary. Any monitoring data will be kept separately from applications and will not form part of the selection decision process.
2. Training and Development

All training and development opportunities at [DOLLY SHOP LTD] shall be accessible to all [EMPLOYEES/WORKERS/CONTRACTORS] regardless of any protected characteristics as defined in this Policy.

[DOLLY SHOP LTD] shall make reasonable adjustments where required to ensure that [EMPLOYEES/WORKERS/CONTRACTORS] with disabilities or other protected characteristics are able to access all training and development opportunities. This includes providing information in alternative formats and allowing extra time for training where necessary.

Relevant [EMPLOYEES/WORKERS/CONTRACTORS] shall be required to undergo unconscious bias training to raise awareness of potential biases and ensure equal opportunity in training access and participation.

Managers and leaders at [DOLLY SHOP LTD] shall undergo inclusive leadership training to develop the skills required to foster an inclusive culture and ensure diversity is properly represented and supported in relation to training and development.

[DOLLY SHOP LTD] shall monitor participation in training based on protected characteristics and take appropriate action to address any underrepresentation or overrepresentation identified and ensure equal access for all.

1. Pay and Benefits

Equal pay. [DOLLY SHOP LTD] is committed to the principle of equal pay for equal work regardless of any protected characteristics as defined in this Policy.

Job evaluation. [DOLLY SHOP LTD] will use analytical job evaluation to measure the demands and responsibilities of roles to ensure equal pay.

Benefits. All benefits provided by [DOLLY SHOP LTD], including but not limited to bonuses and pensions, will be made available to all employees equally, regardless of any protected characteristics.

Reasonable adjustments. Where employees have particular needs in relation to benefits due to a protected characteristic, [DOLLY SHOP LTD] will make reasonable adjustments to accommodate these needs.

Family-friendly policies. [DOLLY SHOP LTD] policies such as flexible working, parental and carers' leave will be made available to meet the needs of all employees equally.

* + 1. Reasonable adjustments to policies. Reasonable adjustments will be made where needed in relation to any protected characteristic to accommodate individual needs under family-friendly policies.
1. Grievance Procedure
	1. Informal Resolution
		1. Any grievances relating to this Policy should initially be dealt with informally between the complainant and respondent. Mediation services may be offered to assist with resolution.
	2. Formal Procedure
		1. If the matter is not resolved informally then the complainant should submit a written grievance to the HR Manager within 28 days of the alleged incident.
		2. The HR Manager will invite the complainant to a grievance meeting to discuss the grievance within 14 days of receiving the written grievance.
		3. The complainant has the right to be accompanied at the grievance meeting by a fellow worker or trade union representative.
		4. The HR Manager will carry out an investigation of the grievance in an objective manner, ensuring all documents and records are properly maintained.
		5. The complainant will receive a written response within 14 days of the grievance meeting, informing them of the outcome and any actions taken.
		6. If the complainant is not satisfied with the outcome, they have a right of appeal. An appeal meeting will be held without unreasonable delay, where a final decision will be communicated in writing.
	3. No Detriment
		1. Complainants will not suffer any detriment or victimisation for raising a grievance or assisting in an investigation.
	4. Records
		1. All records of grievances will be kept confidential in accordance with data protection laws. Anonymous statistics may be used for monitoring purposes.
2. Monitoring and Review
	1. Data collection
		1. The Company shall collect and monitor diversity data in relation to recruitment, pay and benefits, training and development, grievances and disciplinary action on a regular basis. This data shall be analysed by reference to the protected characteristics.
	2. Analysis
		1. The Company shall analyse the collected data to identify any issues or imbalances relating to diversity and inclusion.
	3. Action plan
		1. Where any issues are identified, the Company shall develop an action plan to address these. The action plan shall include targets, responsibilities, deadlines and mechanisms for monitoring progress.
	4. Policy review
		1. The Company shall formally review the entire effectiveness of this Policy on an annual basis, including consulting with Employees. The review shall consider the data collected and analysed and the progress of any action plans.
	5. Reporting
		1. Monitoring reports analysing the effectiveness of this Policy shall be provided to the board of directors on at least an annual basis.
3. Confidentiality

Consent for data processing. [DOLLY SHOP LTD] shall obtain consent from all individuals for the collection and processing of their personal data for the purposes of implementing this Policy.

* 1. Permitted data sharing. Personal data collected under this Policy can only be shared on a need-to-know basis with line managers and others involved in implementing reasonable adjustments or investigating complaints.

Security measures. [DOLLY SHOP LTD] shall ensure that all personal data collected and processed under this Policy is kept securely through password protection of files, encryption of electronic data and access restrictions limiting data access only to authorised personnel.

* 1. Data retention. Health records and other sensitive personal data shall be retained for no longer than 6 months from the end of any engagement under this Policy. Less sensitive personal data may be retained for up to 2 years.
	2. Breach reporting. Any data breaches involving personal data collected under this Policy shall be reported to the Information Commissioner's Office within 72 hours and to all affected individuals without undue delay.

Complaints procedure. Individuals shall be informed of their rights to complain to [DOLLY SHOP LTD] or the Information Commissioner's Office in the event of any breaches of this clause. [DOLLY SHOP LTD] shall also maintain an internal procedure for handling such complaints.

Consequences of unauthorised disclosure. Any employee or other party under a duty of confidentiality found to have shared personal data outside of this clause without permission will be subject to [DOLLY SHOP LTD]'s disciplinary action or contract termination procedures respectively.