



KPO-85

Equality and Diversity Policy

This policy sets out the Company's practices relating to equality in the workplace. These policies are in place to help and protect you. Please try to familiarise yourself with them. The Company's policies are not contractual.

If you are unsure about anything mentioned in either this Handbook or your contract of employment, please contact the Human Resources Department who will be delighted to help you.

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1 Equal Opportunities Policy

Equality Act 2010

- 1.1 The Equality Act 2010 updated and strengthened the equality requirements and duties on all organisations and individuals.

Protected Characteristics

- 1.2 The Equality Act 2010 identifies nine protected characteristics which are specifically included in the legislation
- Age
 - Disability
 - Gender reassignment
 - Marriage and Civil Partnership
 - Pregnancy and Maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
- 1.3 Direct discrimination occurs where someone is put at a disadvantage on discriminatory grounds in relation to his or her employment. Direct discrimination may occur even when unintentional.
- 1.4 Indirect discrimination occurs where one individual's employment is subject to an unjustified provision criterion or practice where e.g. one sex or race/nationality or age group finds more difficult to meet, although on the face of it the provision criterion or practice is 'neutral'
- 1.5 Associative discrimination will occur when a person is discriminated against as a result of an association with a person i.e. a carer for a disabled person.
- 1.6 For example, a requirement for GCSE English as a selection criterion. This would have a disparately adverse impact on people educated overseas and may not be justified if all that is needed is to demonstrate a reasonable level of literacy.

Equality Policy

- 1.7 The Company is an equal opportunities employer. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination on the grounds of disability, colour, race, nationality, ethnic or national origin, sex, gender (including gender reassignment), sexual orientation, age, marital status, religious or other similar philosophical belief.
- 1.8 We aim to ensure that our employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria. We have adopted this policy as a means of helping to achieve these aims.

Managing Implementation & Monitoring

- 1.9 All staff will be involved in creating an equality environment and one that values diversity.

- 1.10 This policy will be monitored to judge to what extent it is working and identify areas for improvement. Monitoring will relate to employees and to service users and methods will include:
- Making available a copy of the policy to prospective applicants
 - Ensuring all new starters have the opportunity to discuss the policy with managers and colleagues
 - Including reference to abiding by the policy in staff contracts and handbooks
 - Making use of meetings to discuss the policy and defining areas where practice could be improved and ensuring that meetings are easily accessible
- 1.11 If monitoring shows that the Company, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the Company, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, Company policies and practices as well as consideration of taking legal Positive Action.

Raising Awareness

- 1.11 To ensure employees and applicants for employment are aware of the equality policy we will ensure that it is accessible to all by:
- Ensuring the document format is accessible through main forms of media
 - Considering whether information should be available in alternative formats, e.g. easy to read or other languages
 - Considering accessibility of locations from which the service is provided.

Commitment

- 1.12 We are committed to ensuring that all of our employees and applicants for employment are protected from unlawful discrimination in employment.
- 1.13 Recruitment and employment decisions will be made on the basis of fair and objective criteria.
- 1.14 Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary and relevant.
- 1.15 All employees have a right to equality of opportunity and a duty to implement this policy. Discrimination is a serious disciplinary matter which will normally be treated as gross misconduct.
- 1.16 Anyone who believes that he or she may have been disadvantaged on discriminatory grounds should raise the matter through the Company's grievance procedure.

2 Equality in Employment – Exiting Employees

Equal Pay Policy

- 2.1 The Company is committed to the principle of equal pay for men and women. In this context “pay” includes not only remuneration but also other benefits of employment such as promotion and training opportunities and access to facilities provided within the employment package from time to time.
- 2.2 We are committed to introducing and maintaining pay systems which are transparent, based on objective criteria and free from sex bias.

- 2.3 Woman and men employed by us are entitled to equal pay if they are undertaking work which is substantially similar or is of equal value to the organisation unless there are specific and clear reasons unconnected with their sex which explain and justify any differential in pay. In some cases individuals carrying out similar work may receive different salaries because of seniority, incremental points, qualifications and other such factors.
- 2.4 You should raise any query or grievance concerning your pay and its evaluation in accordance with the Company's grievance procedures.

Equality Training

- 2.5 Training, development and progression opportunities will be available to all staff.
- 2.6 We will ensure that all training and development programs are designed and regularly reviewed to ensure that they support this policy.
- 2.7 All employees will have equal opportunity to ensure that they can fulfil their roles to the best of their abilities.
- 2.8 All managers will have training in dealing with complaints of discrimination, harassment and/or bullying.
- 2.9 All service users will receive Krypton's equality policy to ensure they understand our expectations.
- 2.10 Training and development will be reviewed annually against our needs as a Company, individual needs and service user needs. This will be done through a variety of forums:
- New starter induction
 - Annual performance appraisal
 - At promotion or transfer

Dealing with Harassment and Discrimination

- 2.11 The Company deplores all forms of personal harassment and seeks to create a working environment where such behaviour does not occur. This procedure is published to inform all employees of the type of behaviour that is unacceptable and to provide employees who are the victims of personal harassment with a means of redress.

It is recognised that the Company has a duty to implement this policy, and all employees are expected to comply with it.

- 2.12 Harassment pollutes the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other employees not themselves the object of unwanted behaviour who are witness to it or who have knowledge of the behaviour. All employees are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Harassment is a disciplinary offence and it will normally be treated as gross misconduct.

What is harassment?

- 2.13 Harassment is either:

2.13.1 Unwanted conduct (whether verbal or not) which is of a sexual or racial nature, or other conduct based on someone's race or gender or marital status or disability or sexual orientation or religious or other philosophical belief or age which affects the dignity of men or work at work; or

- 2.13.2 Bullying of colleagues by intimidatory behaviour; or
- 2.13.3 Unfavourable conduct at work, whether verbal or non-verbal, towards someone based on his/her race, or gender or marital status or disability or sexual orientation or religious or other philosophical belief or age which could affect his/her dignity at work;
- 2.14 A single incident can amount to harassment if sufficiently grave;
- 2.15 Examples of harassment include:
- Insensitive jokes and pranks
 - Lewd comments about appearance
 - Unnecessary body contact
 - Displays of sexually offensive material, e.g. Pin-ups
 - Repeated instances of minor harassment acts
 - Requests for sexual favours
 - Speculation about a person's private life and or sexual activities
 - Threatened or actual violence
 - Threat of dismissal, loss of promotion, etc. for refusal of sexual favours
 - Bullying. Bullying is defined as any form of physical or verbal attack and/or threat of such, or the abuse of position, in order to attack or undermine the confidence or ability of another, or to place another employee under unreasonable pressure or subjecting another to detrimental treatment, by either act or omission
 - Jokes about a person being either too old or too young to do a job properly
 - Age related jokes
- 2.16 Anyone who believes that he or she may have been the victim of harassment should raise the matter through the Company's grievance procedure.

Job Description and Person Specification

- 2.17 Person and job specifications shall be limited to those requirements which are necessary for the effective performance of the job.

Reasonable Adjustments for Employees

- 2.18 The Company will fulfil its duty to make reasonable adjustments to ensure that all employees, as far as is reasonable, have the same access to everything that is involved in carrying out their job as each other.
- 2.19 We will complete our duty to take steps to remove or reduce or prevent the obstacles faced by a disabled worker or job applicant.
- 2.20 We will comply by making adjustments where we are aware, or reasonably aware, that an employee has a disability.

Work/Life Balance

- 2.21 The Company is committed to employees who have commitments outside work, irrespective of whether they have caring responsibilities. We are committed to helping all employees fulfil their potential at work whilst finding the right work/life balance by offering a Flexible Working Hours Scheme and opportunities to job share where appropriate.

- 2.22 The Company aims to improve the working lives of our employees by having a framework of policies such as the Statutory Right to Request Flexible Working, Special Leave to help with caring responsibilities and domestic emergencies and Career Breaks.

3 Equality of Terms and Conditions

Absence

- 3.1 If an employee makes a request for time off, as the employer we will consider the impact on the individual's work and on the organisation as a whole. We are committed to coming to a fair decision and will objectively justify the reasons for this.

Dress Code

- 3.2 Proper attire is necessary to maintain an image, which reflects the Company's professionalism and high standards. It is important that dress is appropriate for the Company's environment.
- 3.3 Where uniforms or items of clothing are provided by the Company they should be worn at all times at work. Uniform should be maintained, kept clean and ironed. On leaving the Company they must be returned in good condition otherwise a deduction from your final wages will be made to cover their cost.

Retirement

- 3.4 As there is now no default retirement age, the Company will not deprive any individual of the opportunity to work simply because they have reached a particular age.
- 3.5 As a business we have not set our own retirement age. Due to the nature of the work involved we do, however, commit ourselves in maintaining health and safety standards and a proper assessment of risk may be necessary where a higher level of risk than the level of risk which normally exists in everyday life is suspected.
- 3.6 The Company is committed to maintaining the dignity of older workers and promotional opportunities are available to all workers of any age group.

Pensions

- 3.7 The company has a pension scheme in place through Nest, all staff joining Krypton FM Group Limited will be contacted by Nest directly, giving them the option to opt into the company scheme or to opt out. Krypton will offer contributions in line with government guidelines alongside the employee contributions, to those that choose to opt in. Pension deductions will show on payslips and statements can be checked through logging in to Nest via your personal account.

4 Equality in Recruitment

- 4.1 The management of Krypton FM Group Limited is committed to ensuring that the recruitment and selection of all employees will be fair, open and transparent and will comply with all relevant legislation. Personal information received is dealt with in the strictest confidence. Inclusion forms an important aspect of the recruitment of staff within the service. Applicants will not be excluded from being considered for a position based specifically on their need, disability, background, culture, religion, gender or economic circumstances. Positions will be offered based on competency, qualification, experience and enthusiasm for the position
- 4.2 The recruitment and selection process is crucially important to any equal opportunities policy. We will endeavour through appropriate training to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or sub-consciously, in making these decisions.
- 4.3 Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.
- 4.4 Job descriptions, where used, will be revised to ensure that they are in line with our equal opportunities policy.
- 4.5 We will adopt a consistent, non-discriminatory approach to the advertising of vacancies.
- 4.6 All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do the job.
- 4.7 Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.

5 Equality in Service Delivery

- 5.1 The Company will promote the development and design of services that are sensitive to the requirements of the diverse clients we serve.
- 5.2 We are committed to achieving the highest standard of service delivery and employment practice.
- 5.3 We will meet our statutory obligations in regard to age, disability, gender, gender identity, race, religion and believe and sexual orientation and will strive to create the best possible quality of life of our employees and clients by delivering the highest quality service within our resources.

6 External Equality in Relationships

- 6.1 Third-party harassment occurs where a Company employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. Krypton FM Group Limited will not tolerate such actions against its staff, and the employee concerned should inform their manager/supervisor at once that this has occurred. We will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

7 Equality Risk Assessment

- 7.1 To assist in analysing our policies and practices we will carry out an Equality Impact Assessment (EIA) to ensure we do not discriminate or disadvantage people.

7.2 We would use a framework which sets out an approach to undertaking an EIA. The Company would consider the following questions before carrying out an EIA to ensure it is carried out as effectively as possible:

- What is the purpose of the policy?
- How is it seeking to achieve this?
- Who benefits and how? (and who, therefore, doesn't and why?)
- What are any 'associated aims' attached to the policy?

7.3 The results of any EIA relating to a policy or practice may lead us to one of the following options:

- We would decide to stop the policy or practice at some point because the data shows bias towards one or more groups.
- We may adapt or change the policy in a way which we think will eliminate the bias.
- We may justify the policy or practice.

8 Respecting Equality and Diversity

8.1 We are committed to equality and diversity. Equality refers equal opportunity whilst diversity pertains to not being discriminated against because a person or group is different. Endorse and embrace people from all backgrounds and respect all beliefs and opinions and we expect our staff to behave in the same manner. Under the Equality Act 2010, it is stated that people should not be discriminated against on the grounds of: -

- Ethnicity
- Sex
- Gender reassignment
- Disability
- Religion and belief
- Age
- Sexual orientation
- Pregnancy and maternity
- Marriage and civil partnerships

Although it is not stated within the Act, we should also respect each other's opinions and where an agreement cannot be agreed, opposing opinions should be respected and individuals should simply agree to disagree.

9 Positive Action

9.1 We are committed to ensuring that all of our employees and applicants for employment are protected from unlawful discrimination in employment.

9.2 Recruitment and employment decisions will be made on the basis of fair and objective criteria.

9.3 Person and job specifications shall be limited to those requirements which are necessary for the effective performance of the job.

9.4 Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary and relevant.

9.5 All employees have a right to equality of opportunity and a duty to implement this policy. Discrimination is a serious disciplinary matter which will normally be treated as gross misconduct.

- 9.6 Anyone who believes that he or she may have been disadvantaged on discriminatory grounds should raise the matter through the Company's grievance procedure.

Signed Javed Iqbal Position: Managing Director Date: 16 / 08 / 2025