



Equality & Diversity

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Table of Contents

1	INTRODUCTION	3
2	SCOPE.....	3
3	ROLES & RESPONSIBILITIES.....	3
4	DISCRIMINATION	4
5	HARASSMENT & BULLYING	4
6	PREVENTING DISCRIMINATION IN EMPLOYMENT	5
7	COMPLAINTS PROCEDURE	7
8	BREACHES OF THIS POLICY.....	7
9	CHANGES TO THIS POLICY.....	8
	AMENDMENT HISTORY	9

1 Introduction

- 1.1 Mastek (“we”) recognise that ensuring equality of opportunity, fairness and valuing diversity in all areas of employment, helps us innovate, deliver our competitive edge and anticipate customer needs.
- 1.2 We are committed to attracting, developing and retaining the brightest and best talent with a focus on recruiting, training and promoting the best person for the job and future needs of our organisation.
- 1.3 We encourage everyone to reach their full potential, regardless of age, gender, marriage/ civil partnership status, gender reassignment, race or ethnicity, nationality, trade union membership or non-membership, disability, religion/ belief, sexual orientation, family/ care responsibilities including pregnancy/ maternity.
- 1.4 We are also determined to create a working environment which supports our values and which is free from any form of discrimination, harassment or bullying and within which all individuals are treated with respect, fairness and courtesy.
- 1.5 The principle of non-discrimination and equality of opportunity applies equally to the treatment of current and former Mastekeepers, job applicants, visitors, clients, customers and suppliers.

2 Scope

This policy applies to all Mastekeepers regardless of length of service or contractual base location. Aim is to ensure that people at each group company are treated equally at work, across all Grades and locations.

3 Roles & Responsibilities

- 3.1 The Group Head of HR is the policy owner.
- 3.2 It is the responsibility of HR and Line Managers to have the primary responsibility for the successful implementation of the policy by:
 - discriminating in the course of employment against Mastekeepers or job applicants;
 - not practising or encouraging others to practise unlawful discrimination;
 - promoting our aims and objectives with regard to equal opportunities; and
 - Taking appropriate action, including where appropriate disciplinary action, for failure to adhere to the policy.
- 3.3 It is the responsibility of Mastekeepers to ensure that you assist us in achieving these objectives by:
 - not discriminating in the course of employment against fellow Mastekeepers, customers, suppliers or members of the public with whom you come into contact during the course of your duties;

- not practising or encouraging others to practise unlawful discrimination; and
- reporting any discriminatory action, whether directed at you personally or not, to your manager, your HR Representative or by raising the issue through the Grievance Resolution Procedure.

4 Discrimination

4.1 A person has been discriminated against if they are treated less favourably than another on the grounds of age, gender, disability, gender reassignment, race or ethnicity, nationality, religion/belief, sexual orientation, marriage/civil partnership status or family/ care responsibilities including pregnancy/ maternity. These are collectively known as 'protected characteristics'. [Equality Act 2010]

4.2 Discrimination is unacceptable regardless of whether it is intentional or unintentional.

4.3 There are a number of different types of discrimination:

- 4.3.1 **Direct Discrimination** - treating someone less favourably because of a protected characteristic. For example, rejecting a job applicant because of their religious views or their sexual orientation;
- 4.3.2 **Indirect Discrimination** - a policy or practice that applies to everyone but disadvantages a particular group of people with a protected characteristic. For example, requiring a job to be done full time rather than part time would adversely impact more women than men because they generally have greater childcare commitments. Such a requirement would be discriminatory unless it can be justified;
- 4.3.3 **Victimisation** - treating someone unreasonably because they have made or supported a complaint under this policy;
- 4.3.4 **Harassment** - see section 6 below.

4.4 It is also unlawful to discriminate against someone because they associate with another person with a protected characteristic. For example a Mastekeeper who has a disabled son.

5 Harassment & Bullying

5.1 Harassment means unacceptable physical, verbal or non-verbal conduct which is unwanted, unreasonable or offensive and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

5.2 Harassment may be discriminatory when it is on the grounds of a protected characteristic (see above) and a single incident can amount to harassment.

If the unwanted conduct is not discriminatory harassment then it may be bullying. Like harassment, bullying is unsolicited or unwelcome acts that humiliate, intimidate, undermine or threaten another Masteker causing unnecessary distress which may lead to absenteeism and under-performance in the short-term, and in the longer-term have a detrimental effect on the health of Mastekers and the business. Bullying can take the form of physical, verbal and non-verbal conduct. We will not condone any form of bullying and like harassment, bullying may be considered gross misconduct and as such may lead to summary dismissal.

5.3 The following types of behaviour may amount to harassment, or bullying. The list provides examples only and is not intended to be exhaustive:

- physical assault;
- physical or verbal abuse including threats;
- suggestive comments or gestures;
- suggestive or offensive emails;
- insulting or abusive behaviour or comments;
- isolation or exclusion from work opportunities, corporate, social or sporting events;
- persistent criticism or humiliation;
- unfair allocation of work or responsibilities.

6 Preventing Discrimination in Employment

6.1 Recruitment & Selection

- 6.1.1 We will ensure that information about external job opportunities is circulated as widely as possible where appropriate to ensure that it reaches all sections of the community. All applications are welcomed and are considered for selection on the relative merits of the applicant against the job and/or person specification for the position regardless of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.
- 6.1.2 Job descriptions will only include criteria which are objectively required for the duties and responsibilities of the vacancy and will be drawn up before the recruitment process begins. However, if there is a genuine and lawful reason for limiting the vacancy to a particular group, this reason and the grounds for it will be clearly stated on any advertisements.
- 6.1.3 We retain the discretion to invite applications from individuals whose job may be at risk of redundancy or who require redeployment for health or disability reasons before advertising the vacancy more widely.

6.2 Training, Personal and Career Development

- 6.2.1 We aim to provide everyone with the appropriate learning and development opportunities to enable them to improve their performance and achieve the performance targets set for them.
- 6.2.2 Opportunities for learning and development are available to everyone based on role/needs of the job and encouraging personal development. Promotion is based on merit and the reasonable requirements of the job only.

6.3 Terms and Conditions of Employment / Engagement

- 6.3.1 We aim to ensure that terms and conditions of employment/terms of engagement are free from all forms of direct and indirect discrimination and apply equally regardless of age, gender, marriage/ civil partnership status, gender reassignment, race or ethnicity, nationality, disability, religion/ belief, sexual orientation, family or care responsibilities including pregnancy/ maternity. Our grievance and disciplinary procedures will operate without discrimination.
- 6.3.2 We recognise the need to balance personal and work life and that flexibility with regard to working patterns assists the broadest range of people. Our flexible working policy actively encourages and supports this.

6.4 Ending Employment

- 6.4.1 We ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- 6.4.2 We will also ensure that our disciplinary, performance and absence management policies and procedures are applied without discrimination, whether they result in warnings/ cautions or not

6.5 Disabled Persons

- 6.5.1 If you are disabled or become disabled in the course of your employment with us, you are encouraged to notify your manager about your condition and any special needs you may have. Please ensure that your HR Business Partner is notified of the nature of your disability and kept informed of any changes in your condition. You may also wish to advise your manager or HR Business Partner of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary or which could assist you in the performance of your duties.
- 6.5.2 Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job.

6.6 Meditation Space

- 6.6.1 If you wish to pray or require quiet time during the working day, we will endeavour make a space available as needed.

6.7 Procurement

- 6.7.1 If you wish to pray or require quiet time during the working day, we will endeavour make a space available as needed.
- 6.7.2 We will put procedures in place to ensure that suppliers from diverse communities have appropriate opportunities in competing for contracts and we will take action to encourage such businesses through our supply chains, to comply with their anti-discrimination responsibilities and best practice on diversity issues.

7 Complaints Procedure

- 7.1 If you feel, or other Masteker(s) have experienced or are experiencing any form of discrimination, harassment or bullying, you should discuss the matter with your manager or contact your HR Business Partner for advice and support in the first instance.
- 7.2 Following initial discussions with your manager or HR Business Partner, the following options (*) will be available to you:
 - no further action necessary;
 - discuss the complaint directly with the individual who is alleged to have caused the offence;
 - ask your manager, HR Business Partner to help you resolve the matter through informal approaches;
 - make a formal written complaint (using the Grievance Resolution Policy and Procedure). This will normally initiate a full investigation and if appropriate, recourse to the disciplinary procedure.
- 7.3 (*) please be aware that depending on the nature of the alleged discrimination, harassment or bullying we may determine that it is appropriate for the matter to be dealt with on a formal basis.

8 Breaches of this policy

- 8.1 If any investigation under the formal procedure concludes that there appears to substance to the complaint, it will normally be appropriate for the matter to be considered further under the disciplinary policy and procedure. Such behaviour may amount to gross misconduct and as such may lead to summary dismissal.
- 8.2 We will protect individuals who make a complaint or assist in an investigation from harassment and victimisation. Any acts of retaliation or intimidation against the complainant may be considered further under the disciplinary policy and procedure.
- 8.3 If individuals maliciously make an unfounded complaint then it is likely that this may be considered under the disciplinary policy and procedure.

8.4 Where the offending party is a third party, appropriate action will be taken - such as putting up signs setting out acceptable and unacceptable behaviour, speaking or writing to them in person and/or their manager about their behaviour, or in very serious cases, more severe formal action may be taken.

9 Changes to the policy

This policy does not form part of your contract of employment. It may be amended at any time and Mastek may depart from it depending on the circumstances of the case.

Amendment History

Date	Version	Created by	Amendment History	Remarks	Approved by
20-Sep-2018	2.0	BHR	Removal of out of date terms. Updating of wording and definitions		Head HR UK
18- Dec - 2019	2.1	BHR	Scope re-defined Change of ownership		Group CPO



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