



Equality and Diversity Policy

Applicable to:

All persons within HBC

Effective from:

January 2026

Policy/Guidance Number:

2026

To be reviewed by:

Linked documents:

Whistleblowing policy

Versions:

Version 1 – January 2026

Overview

This policy applies to all employees within HBC.

This policy aims to make clear our approach to equality and diversity, and the responsibility of all employees to adhere to it.

Contents

1.	Introduction.....	4
2.	Our commitment.....	4
3.	Protected characteristics.....	5
4.	Types of discrimination	6
5.	Procedure	7
6.	Concerns about discrimination	9
7.	Monitoring and assessment.....	10

1. Introduction

We are committed to creating a culture that respects and values each other's differences, that promotes dignity, equality and diversity, and that encourages people to develop and maximise their true potential.

It is our policy to treat all employees, potential employees, customers and other stakeholders fairly and equally regardless of their sex, sexual orientation, transgender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status, or political belief. We will also ensure that no requirement or condition will be imposed without justification that could disadvantage people purely on any of the above grounds.

The policy applies to recruitment and selection, terms and conditions of employment including pay, promotion, training, transfer, and every other aspect of employment.

We are committed to the implementation of this policy and to a programme of action to ensure that the policy is, and continues to be, fully effective. Everyone at HBC is required to comply with this policy and to act in accordance with its objectives so as to remove any barriers to equal opportunity. Any act of discrimination by employees or any failure to comply with the terms of the policy will result in disciplinary action.

Equal opportunity is about good employment practices and efficient use of our most valuable asset, our people. Every line manager and employee must take personal responsibility for the implementation of the policy. Any instance of doubt about the application of this policy, or other questions, should be addressed to the HR team, as should any requests for special training.

You should be aware, at all times, of the importance we attach to our equality and diversity policy, and must ensure that your actions, attitudes and behaviour do not directly or indirectly discriminate against job applicants or employees.

2. Our commitment

We are committed to equality of opportunity and to the elimination of direct and indirect discrimination, harassment and victimisation of employees, job applicants, customers and contractors alike. We aim to create and maintain a working environment, terms and conditions (including equal pay for work of the same or similar nature or work of equal value) and personnel and management practices which ensure that no-one receives less favourable treatment on the grounds of their:

- Sex
- Race
- Religion or belief
- Nationality
- Colour
- Ethnic origin
- Age

- Marital or parental status
- Gender (including gender reassignment)
- Sexual orientation
- Physical or mental disabilities.

This list is not exhaustive.

Furthermore, we are committed to:

- Creating an environment in which individual differences and the contributions of all our people are recognised and valued.
- Ensuring that everyone has a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated. Anyone experiencing any form of intimidation, bullying or harassment or any other form of discrimination should submit a grievance to their line manager.
- Offering training, personal development and career progression opportunities to all.
- Demonstrating that equality in the workplace is good management practice and makes sound business sense.
- Reviewing all our employment practices and procedures to ensure fairness.
- Ensuring that breaches of this policy are regarded as misconduct and could lead to disciplinary proceedings.

3. Protected characteristics

The current legislation identifies nine protected characteristics:

- Age: It is unlawful to discriminate against a person who is not a certain age or in a certain age group. It is also unlawful to discriminate by perception (when you assume someone is a particular age) and by association (when you are connected to someone of a particular age).
- Disability: The legislation defines a disabled person as "someone with a physical or mental impairment which has substantial and long-term adverse effect(s) on his/her ability to carry out normal day to day activities."
- Gender reassignment: Gender reassignment is defined as "a process which is undertaken under medical supervision for the purpose of reassigning a person's sex by changing physiological or other characteristics of sex and includes any part of such a process."
- Marriage and civil partnership: It is unlawful to discriminate against people who are married or in civil partnership. As defined by the law, civil partnership means someone who is legally married or in a civil partnership. Marriage is between a man and a woman, or between same sex couples. Civil partnership is between partners of the same sex.
- This characteristic does not apply to:
 - Single people
 - Those living together as a couple but who are not married or in a civil partnership

- Those who are engaged to be married
 - Someone who is divorced or their civil partnership has been dissolved.
- Pregnancy and maternity: It is unlawful to discriminate against an employee because of their pregnancy, or because they have given birth recently, are breastfeeding, or on maternity leave. Discrimination is unfavourable treatment towards a woman because of her pregnancy, pregnancy-related illness, or her right to statutory maternity leave.
 - Race: It is unlawful to discriminate against someone on the grounds of their:
 - Race (eg. whether they are Caribbean or Asian)
 - Colour (eg. whether they are black or white)
 - Nationality (eg. whether they are Bangladeshi or Nigerian)
 - National origin (eg. whether they are Welsh or Kurdish)
 - Ethnic origin (eg. whether they are Jewish).
 - Religion and belief: Legislation covers any religion, religious belief or similar philosophical belief, but does not cover political belief or cults. Minority religions are treated with the same consideration and respect as more prominent religions. There is no exhaustive definition of these beliefs.
 - Sex: The legislation recognises sex as a protected characteristic that protects men (being a man) and women (being a woman). Pregnancy, maternity, and gender re-assignment are now separate protected characteristics.
 - Sexual orientation: The term describes whether someone is attracted towards people of the same sex (heterosexual), opposite sex (gay/lesbian) or both sexes (bisexual).

4. Types of discrimination

Direct Discrimination: Occurs when someone is treated less favourably than another person because of a protected characteristic.

Associative discrimination: This is direct discrimination against someone because they associate with another person who possesses a protected characteristic (eg. a mother of a disabled child). It does not apply to marriage/civil partnerships or pregnancy/maternity.

Perceptive discrimination: This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. It does not apply to marriage/civil partnerships or pregnancy/maternity.

Indirect discrimination: Indirect discrimination can occur when a condition, rule, policy or a practice applies to everyone, but which may particularly disadvantage people who share a protected characteristic. It does not apply to pregnancy/maternity.

Harassment: Harassment is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. Harassment may also include complaints of behaviour found to be

offensive even if it is not personally directed at the individual and the complainant need not possess the relevant characteristic themselves. The protection is extended in that employees are also protected from harassment because of perception and association. See the bullying and harassment policy for more information.

Victimisation: Victimisation occurs when a person is treated badly because they have made or supported a complaint or raised a grievance under the legislation, or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

5. Procedure

As an equal opportunities employer we recognise the need for continual action in order to promote equality of opportunity. Every manager and employee have a personal responsibility to implement this policy.

Our customers, suppliers and the general public must be treated consistently within this policy.

Recruitment, training and promotion decisions will only be made with reference to the requirements for that position. Anyone involved in recruitment, training or promotion will be provided with relevant training and should ask for additional training should they feel it necessary.

Employees who are disabled or become disabled in the course of their employment should inform us about their disability and advise us of any reasonable adjustments to their job, working conditions or environment that might assist them in the performance of their duties. Careful consideration will be given to any proposals and, where reasonable and reasonably practicable, we will make such adjustments. There may, however, be circumstances where it will not be reasonable or reasonably practicable for us to accommodate those proposals.

All employees and job applicants will be asked to provide information relating to their gender, race, ethnic origin, age and any disabilities. We guarantee that the information provided on this form will be used solely for the purpose of monitoring the effectiveness of our equality and diversity policy.

The composition of our workforce and job applicants will be monitored on a regular basis. Should inequalities in recruitment, training or promotion become apparent, we may take positive action, if appropriate, to redress the imbalance.

Any employee who harasses or treats another employee less favourably on the grounds of their sex, sexual orientation, transgender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/belief, age, disability, union membership status or political belief will be subject to our disciplinary and dismissal procedure.

5.1. Recruitment

We will not:

- Discriminate unlawfully in arrangements for determining who should be offered employment
- Discriminate unlawfully on the terms on which employment is offered, and
- Discriminate unlawfully by refusing to offer employment.

Sources of candidates

Sourcing of applicants should include not only local, national and trade press, but also a combination of the following: employment agencies, employment services, search and selection consultants, existing employees, direct applicants, schools, careers, further and higher education establishments etc. as appropriate.

Advertising

It is necessary to state that we are an equal opportunities employer in all recruitment advertising (both internal and external), and that we welcome applications from everyone, regardless of sex, sexual orientation, transgender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/belief, age, disability, union membership status or political belief. Clear instructions must be given on how an application should be made.

Interviews

The interview is the stage of the process at which the recruiter is most vulnerable to their own subjectivity.

Interviews should always be confirmed in writing, or via the preferred format for a visually impaired candidate.

All candidates will be asked prior to their interview if they have any special requirements in order for them to not be disadvantaged at the interview stage.

Selection

The selection criteria described within the job specification and person specification are designed so that only relevant competencies are measured and only at the relevant level.

5.2. Promotion and transfer

All criteria that contribute to our decisions for promotion or transfer must be objective, free from bias, justifiable and must not discriminate unlawfully either directly or indirectly.

5.3. Learning and development

The selection criteria used for access to development opportunities should not discriminate unlawfully either directly or indirectly.

As part of this process, a person's needs are assessed against the following criteria:

- Requirement for the person's current job
- Requirement for a job to which the candidate is to be promoted

- Legal or best practice requirements, and
- Personal development.

5.4. Performance development reviews (PDRs)

The PDR discussion must be conducted in such a way that it does not discriminate.

5.5. Communications

It is our policy to make every effort to avoid the use in all internal and external communications of gender-biased language and oppressive or offensive terminology and imagery, and to promote inclusive language and imagery.

6. Concerns about discrimination

If you have any concerns regarding inequality of opportunity, please pursue the matter through our grievance procedure.

Alternatively, you can use the whistleblowing (disclosure) policy if it you feel that the grievance procedure is inappropriate. We want you feel comfortable about raising such complaints. No-one will be penalised for raising such a complaint unless it is untrue and made in bad faith.

6.1. Breaches of the equality and diversity policy

Any employee who does not implement this equality and diversity policy will be subject to disciplinary action up to and including summary dismissal.

We are committed to:

- Supporting the principles and practices of equal opportunities and ensuring that it's the duty of all employees to accept personal responsibility for implementing and adhering to the principles of equal opportunity and maintaining harmony in the work environment.
- Actively promoting equal opportunities throughout the organisation through the application of employment policies and practices which will ensure people receive treatment that's fair and equitable and consistent with their relevant aptitudes, potential, skills and abilities.
- Ensuring that all managers ensure that all employees comply with these principles.
- Ensuring that people are recruited, remunerated, promoted and trained on objective criteria, having regard to their relevant aptitudes, potential, skills and abilities. In particular, no applicant will be placed at a disadvantage by requirements or conditions which are not necessary to the performance of the job, or which constitute direct or indirect unfair discrimination.
- Monitoring the composition of our employees and applicants for jobs on an anonymous basis at all levels.
- Monitoring the number and outcome of complaints under the equality and diversity policy, and the bullying and harassment policy. A report will be made to the board annually.

- Ensuring that no employment decision is based on irrelevant or discriminatory criteria.
- Where our business needs allow, reviewing working patterns to enable us to offer flexible working where practicable, to employees and to applicants for employment who have care or childcare responsibilities.

7. Monitoring and assessment

We will assess and review the effectiveness of this equality and diversity policy, and the impact of all other relevant policies and practices on all employees.