

## Equality and Diversity Policy

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## Purpose

John F Hunt Regeneration Limited, hereon referred to as the 'Company' is committed to the principle of equality, diversity, opportunity and preventing discrimination and achieving the aims of The Equality Act 2010 and the Human Rights Act 1998. The Company will not discriminate on the grounds of race, colour, ethnicity, marital status, sexual orientation, gender (including gender assignment), religion, philosophical belief, disability, age, caring responsibilities, pregnancy and maternity leave, spent convictions, union or other association membership or any other factors not relevant to our work.

The purpose of this policy is to promote the equality of opportunity afforded to each Employee, potential Employee or past Employee of the Company irrespective of matters such as their sex, race, disability, sexual orientation, religion, beliefs, age or association or membership of any political union.

In the advertising and recruitment of personnel for employment the Company wishes to ensure that it promotes a harmonious equal opportunities policy by ensuring we do not discriminate against any applicant.

All Directors and Managers must ensure that advertisements, interview lists, interview processes and Employee selection do not discriminate against any person.

It is the desire of the Company not to intentionally show favour with one group of the community but to try and establish an equal base for all. Where necessary should an applicant from any minority group be seen to be keen but lacks experience then we must consider the benefits of a training programme for that person.

As part of this policy reference shall also be made to the Company Corporate Social Responsibility policy.

## Aims

This Policy aims to achieve the following objectives:

- Being an employer of choice that attracts a diverse range of candidates, and values the diversity of its workforce;
- Ensuring that Employees remain long term with the Company and feel a valued member of it and can contribute to its progress and its continuing success;
- Continuing its policy of providing training and experience by temporary or permanent employment of a diverse range of people from the local community in the vicinity of company operating sites;
- Encouraging and supporting Employees no matter what the diversity in fulfilling their potential to their and the Company's benefit;
- Preventing and removing discrimination within Company employment criteria and activities and aligning our policy with our those of our Clients;
- Everyone will have the right to be treated with dignity and respect;
- To adopt fair and inclusive practices and we will seek to eliminate all prejudice, discrimination, bullying and harassment;
- All Employees will have the right to work free of any verbal or physical abuse;
- Respecting the human rights of all Employees whatever the diversity;
- Procuring services from the diverse range of local contractors and suppliers;
- Non-compliance with this policy will not be tolerated and any issue will be treated as a serious offence and will be subject to the company disciplinary procedures;
- Ensuring we balance the requirements of the Company against the lifestyle needs of the Employee;
- Respecting the right of individuals, their customs, traditions and their right to freedom of association and the right to decide whether to join a trade union. We will negotiate in good faith with appropriately elected representatives of our Employees;

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- All Employees will have annual employment reviews with their reporting Director and any concerns from both parties will be resolved along with determining future career and training progression;
- Recruiting, employing, and promoting Employees based on objective criteria and the qualifications and activities needed for the job to be performed in line with our Equal Opportunities Policy;
- Ensuring that all employees are:
  - Fit for Work;
  - Fit for Tomorrow;
  - Fit for Life.
- Through occupational health questionnaire assessments, medical assessments, circulated information, and consultations with our employed occupational health provider;
- Ensuring Non-English Employees are trained and have access to Occupational Health services;
- The performance of the Company is determined through Employee questionnaires;
- Any Non-English-speaking employee wishing to learn or improve their English language skills and cover all reasonable costs;
- The Company employs only on experience not ethnicity, and those that lack experience we implement a training programme that will assist in gaining that experience.

### Definitions

#### Direct Discrimination

This consists of treating a person less favourably than others are or would be treated in the same or similar circumstances. At no time will the Company allow direct discrimination. **EVERYBODY is equal.**

#### Indirect Discrimination

This consists of applying all the requirements of the Act to all sections of the workforce no matter what their origin and, although applied equally to all racial groups it is found only a small proportion of any racial group can comply with the requirements and it cannot be shown to be justifiable on any other than racial grounds, i.e.:

- Demanding the wearing of the same safety headwear for everyone (it can be varied for reasons of religion etc.);
- Demanding a higher language standard from minority groups, which is not necessarily needed for the post.

It is the desire of this Company not to intentionally show favour with one group of the community but to try and establish an equal base for all. Where necessary, if the applicant from any minority group is felt to be keen but lacks experience then we must consider the benefits of a training programme for that person.

#### Implementation

The Company Directors are ultimately responsible for this policy, its implementation and annual review.

All staff have a responsibility to behave in a manner consistent with valuing and respecting the diversity of their colleagues and clients.

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Company Employees will be encouraged to increase their knowledge of customs and practices from our diverse group's members and other official sources, e.g., the Diversity Works for London website. The Company aims to use such a source of information in developing its diversity systems and practices.

All site Project Managers will be responsible for ensuring they manage their remediation sites in a manner consistent with the purpose and aim of this policy and that they proactively address behaviours amongst their site team and Subcontractors which are inconsistent with these.

Breach of this policy or behaviour inconsistent with its purpose and aims will lead to disciplinary action by the MD/COO/CEO.

If any Company Employees are concerned that this policy is not being fully implemented in their area, or they have concerns around potential inequalities, they have a duty to raise this with the responsible Director or Managing Director as appropriate.

The Company does not condone harassment, victimisation, direct or indirect discrimination.

The Company Equality and Diversity Policy statement is expected to be evident in and applied to:

- Our culture and working environment;
- Recruitment and selection;
- Terms and conditions of employment (including pay);
- Our Subcontractors and Suppliers;
- Training and development;
- Career progression;
- Annual performance reviews;
- Redeployment and redundancy.

The contents of this Equal and Diversity Policy will be circulated to the Directors of this Company, all Managers and Employees and must be implemented in accordance with the contents therein.

## Recruitment and Employment

### Recruitment

In the advertisement and recruitment of personnel for employment we wish to ensure that the Company promotes a harmonious equal opportunities policy by ensuring we do not discriminate against any applicants protected characteristics such as:

- Age;
- Race;
- Colour;
- Gender;
- Sexuality;
- Gender Reassignment;
- Civil Partnership Status;
- Ability Disability or Disadvantage;
- Religion or Religious belief;
- Association or membership of any political union.

The priority in employing people should be their knowledge, skills and experience, however, any potential Employee who shows an interest or aptitude must be given the opportunity of employment and that interest developed by training and work experience packages.

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The main method of recruitment will be by job advertisement in the local press and job centres with the parameters of the advertisement being:

- The Job Requirement;
- Start Date;
- Wage Details;
- Experience preferred, but not limited to;
- Training will be given to the successful applicant(s);
- The Company is an Equal Opportunities Employer.

Where the Company is employed by a client such as a Local Authority or Housing Association then their facilities and management should be utilised so that our recruitment requirements can be communicated to local residents via these facilities.

All Directors and Managers must ensure that advertisements, interview lists, interview processes and Employee selection do not discriminate against any person because of the previously mentioned points.

It is the desire of the Company not to intentionally show favour with one group of the community but to try and establish an equal base for all. Where necessary, if the applicant from any minority group is felt to be keen but lacks experience then we must consider the benefits of a training programme for that person.

Selection criteria and procedures will also be regularly reviewed to ensure that no group is adversely and unjustifiably affected and that in recruitment and promotional exercises all candidates are considered solely based on their relative merits and abilities no matter what their creed, age or situation.

From the job application, interview, and employment everyone will be treated as becoming a member of a team in the industry in which we operate.

## Employment

The Company is committed to provide and maintain a productive Employees relations environment developed through effective communication to ensure that everyone understands the aims and objectives of the business and how everyone can contribute to the performance of the business.

The business also understands the importance of recognising the contribution of each Employee to the success of the business and will strive to develop a positive environment in which all staff are encouraged to improve their own and others' performance. Also, that all Employees remain with the Company on a long-term basis and feel a valued member of the organization and can contribute to its future.

Equality of opportunity for all sections of the community and for our workforce is an essential value of the Company. This means recognising the inequalities that people suffer and taking action to reduce them. We believe that everyone has a role to play in ensuring fairness towards colleagues and the community.

Our commitment is integral to the employment conditions of each member of staff. We expect all our staff to promote equal opportunity in the workplace and in their outside activities to help redress inequality.

The aim of our policy is to ensure that no job applicant or Employee receives less favourable treatment on the grounds of any issue.

To ensure that any direct or indirect discrimination does not occur. Recruitment and other employment decisions will be regularly monitored in conjunction with ethnic records of job applicants and existing Employees.

The Company will reorganize areas of employment to suit the needs of any female who is pregnant and the following maternity leave requirements, including a HR representative visiting the person to see if the company can be of further assistance. Any person on such leave will have their employment guaranteed.

All Employees will be given equal opportunity and encouraged to progress via training within the organization and attention will be given to possible remedies for under representation of any Employees within the Company.

It is the duty of all Employees to accept their personal responsibility in the implementation of the equal opportunities policy. At the same time, we acknowledge that specific responsibilities fall upon management, supervisors and individuals professionally involved in recruitment and Employee administration.

The Company will treat any deliberate breach of its equal opportunities policy as a disciplinary offence.

Any Employee who believes that he or she has been unfairly treated in any sense associated with this policy is entitled to raise the matter through the appropriate grievance procedure.

The services provided by the Company are hazardous and of a specialist nature and therefore can be extremely dangerous if not controlled, not only to the Employee but also to others and the public in general. The priority in employing people should be their experience. However, any potential Employee who shows an interest or aptitude must be given the opportunity of employment and that interest developed by training and work experience packages.

The Company will ensure all Employees are Fit for Work, Fit for Tomorrow, and Fit for life through its Company occupational health management scheme.

The Company will always consider the Employees lifestyle requirements against work requirements.

The Company is committed to the right that everyone goes home unharmed as all harm is preventable and everyone within the Company shall work together to achieve this.

Everyone will have the right to refuse to work on the grounds of safety without fear of recrimination. All such issues will be investigated immediately and actioned.

Welfare facilities will be provided in accordance with the Company Safety Standard "Welfare facilities" for all company employees.

## Disabled Persons

The Company has a commitment to the employment of disabled persons whether that disability is physical or a medical condition whether on a temporary basis or permanent from the local community where a remediation project is being undertaken or where the Company headquarters is located. As the services provided by our companies are hazardous and of a specialist nature and therefore can be extremely dangerous if not adequately controlled for the Employee employment will be restricted to site and main offices working.

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The Company headquarters have been adapted to ensure that disabled Employees are able to access and egress the premises easily and have easy access to all the facilities within the building with the minimum of inconvenience.

### Age Discrimination

The Company does not operate an age discrimination policy but operates a system where dependant on whether their skills, experience and competency are of value to the Company, senior Employees who are due to retire are encouraged through discussion to undertake a post consultancy package on mutually agreeable terms for a period of the Employees' choice.

### Employee Selection and Interview

The method of interview selection from the recruitment replies shall be based upon a standard check format thus ensuring the method is fair, non-discriminatory, and based initially on experience. However, the priority shall be willingness and interest if there is no experience.

Interview techniques of potential Employees should also be carried out to a standard format, again with no discrimination relating to any group and noting the following:

- Interest in the work and becoming a team member;
- Willingness to learn and be trained;
- Experience and/or knowledge of relevant activities;
- Personal presentation;
- Ability.

### Employee Training

All new Employees will undergo a probationary training period in accordance with the Company training policy. During this period, they will be assigned to a Line Manager during this period who will determine what their additional training needs are.

The Training Manager will add the employee to the Company training database – Competency Cloud – and on completion of their 3-month probationary period, any training requirements will be discussed with their Line Manager and arrangements made to schedule training for the individual.

Employees will be provided with appropriate training regardless of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation, or religion. All Employees will be encouraged to discuss their career prospects and training needs with their Line Manager or the HR Department.

After a period of induction any new Employee shall be given the opportunity to develop their employment by specific training so they can become qualified and thus competent in the various trades. This opportunity shall be based upon the Employee's willingness to develop their skills and will not be discriminatory towards colour, age, gender, ability, or experience.

All Employees will be encouraged to seek promotion within the Company by their career development and the Company will also be willing to financially sponsor any Employee keen to progress their career via further adult education or college attendance.



## Supplier Diversity

In creation of our own supply chain, we ensure that our suppliers comply with the current legislation with regards to health, safety and environmental matters and suppliers go through a rigorous vetting procedure to ensure that they meet the Company's safety standards.

Whenever possible the Company will seek to employ or contract with local labour providing they meet the health, safety and environmental standards set by the Company.

The Company also supports the work carried out by Diversity Works for London (DWfL) by getting advice to produce a step change in their diversity practices, achieving a London where they harness the benefits of a diverse workforce, marketplace and supplier base and provide all Londoners with equal life chances.

## Policy Communication

As part of all levels of Employees training the aims of the Policy will be discussed as part of their induction training and again at regular intervals through site meetings and management meetings.

## Monitoring

The effectiveness of this policy will be monitored by reviewing any raised concerns or identified issues on a regular basis and through Employee consultations and individual discussions.

The Company will continuously develop its monitoring processes and aim for these to be carried out annually which will include assessing the ethnic breakdown of applicants for posts and staff across the business units and used in setting our plans for recruitment.

During the regular site safety inspections of company sites and facilities by the Associate Director of Health, Safety, Environment and Quality, informal discussions will be held with all categories of Employees where such topics as safety, training, company news and personal concerns are discussed. Any issues of concern are then noted for discussion at senior management meetings.

All Employees will undergo annual performance assessments by their Line Manager where their work performance, training achievement and requirements, job satisfaction and any personal concerns will be discussed, and any changes or actions required will be implemented.

Where concerns relating to the requirements of this policy are identified by the monitoring procedures then those procedures will be reviewed and if necessary, changes made. All persons will be advised of the implemented changes via company issued bulletins.

All supply chain Subcontractors and Suppliers will be required to sign up to the contents of this policy and actively encourage its requirements within their businesses.

## Management Responsibility

The management representatives for ensuring the requirements of this policy are implemented, maintained, continuously monitored, and circulated to all managerial and site employees will be:

- Ben Williams, CEO;
- Chief Operating Officer, COO;

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- Managing Director(s);
- Operations and Project Directors & Managers;
- Compliance & Training Manager and Associate Directors HSEQ.

### Policy Communication

The contents of this Equal Opportunity Policy will be circulated to the directors of this Company, all managers and Employees and must be implemented in accordance with the contents therein. As part of training the aims of this policy will be discussed with all levels of Employees as part of their induction training, and again at regular intervals through site meetings, and management meetings.

### Disciplinary & Grievance Procedures

The Company has adopted a grievance procedure to provide Employees who consider that they have a problem or complaint about their work with a mechanism for resolving the issue fairly and speedily. The grievance procedure encompasses the stated grievance procedure.

The Employer and Employee will both be bound by the requirements of the Employment Acts and Company procedures. The Company is committed to ensure there is absolutely no discrimination in the implementation and progression of the Company's disciplinary procedures.

Such procedures will be implemented for all safety infringements and on Employees involved in racial harassment or abusive or physical abuse on others from the minority groups.

Disciplinary procedures will consist of the following:

- All Employees will be initially verbally notified of any infringement they have made by their Line Manager who will record such warnings in writing;
- Failure to comply with the warning will result in a written warning from a Director with a copy placed on the employee's file;
- Further infringements will require the Employee(s) to meet with a Director to discuss the continuing infringements. Based upon the severity of the offence the result will be instant dismissal or notice of termination of employment in seven days served upon the employee in writing by the Director.

### Employee Benefits

The Company recognizes the value of its Employees therefore aims to attract and retain skilled Employees and enhance the life/work balance of everyone. The Company offers its entire staff a range of benefits, including a pension scheme, life insurance, maternity and paternity leave and a good holiday allocation. Also available to all Employees are personal development and training programs designed to enhance each Employee's skill base. All such programs shall relate directly to the role of employment the individual is undertaking and linked closely with their annual performance review.



**Ben Williams**  
CEO  
August 2024