

## **EQUALITY, DIVERSITY AND INCLUSIVITY POLICY**

### **1 POLICY STATEMENT**

Cripps is committed in all its activities as an employer, supplier of legal services and user of other businesses and individuals to:

- the elimination of discrimination, and
- the promotion of equality of opportunity, diversity and inclusivity.

We are a signatory to the Law Society's Diversity and Inclusion Charter and comply with the Equality Act 2010.

Diversity and equality of opportunity are important to us. We appreciate that each individual is by definition, unique. We aim to treat people fairly and to recognise and respond to their individual needs, experiences and aspirations. Human diversity strengthens and enriches our organisation.

We further recognise that some people are socially excluded from society in that they have, or perceive themselves to have, no recognition by, or voice or stake in, the society in which they live.

Building a truly diverse and socially inclusive business is a long term and ongoing process and we are committed to achieving this. We recognise that it is a key area for the business and one which we have to continuously monitor and strive to improve. Our aim is to build a culture that values meritocracy, openness, fairness and transparency.

Specifically, Cripps will consider all people on merit and will not discriminate, without lawful cause, nor victimise or harass on the grounds of:

- Age,
- Disability,
- Gender re-assignment,
- Marital or civil partnership status,
- Pregnancy or maternity,
- Race, colour, nationality, ethnic or national origin,
- Religion or belief,
- Sex, or
- Sexual orientation

Our understanding of what is meant by discrimination is set out in appendix 1 to this document where some the definitions used in this policy can also be found.

The principles of non-discrimination and equality of opportunity apply to the way in which our people treat each other as well as how they treat job applicants, visitors, clients, counsel and experts instructed by Cripps, suppliers and former members of staff.

## **2 WHO IS COVERED BY THE POLICY?**

The policy covers all individuals working at or for Cripps, including all employees, partners, consultants, contractors, trainees, casual workers and agency staff.

## **3 RESPONSIBILITIES UNDER THE POLICY**

The Management Board has overall responsibility for ensuring the policy is adhered to.

The Head of HR is responsible for the administration of the policy and for ensuring it is in effective operation.

All our people have a responsibility for their personal behaviour in relation to equal opportunities, diversity and following all aspects of this policy.

All our people are made aware of the contents of this policy and receive appropriate training and support to promote its application.

## **4 SCOPE OF THE POLICY**

This policy applies to every aspect of employment including advertising, recruitment and selection, training, opportunities for promotion, conditions of work, pay and benefits, conduct at work, disciplinary and grievance procedures and termination of employment. The application of the policy to specific aspects of employment is dealt with in more detail below.

This policy also applies to all aspects of Cripps' delivery of services and acquisition of services from suppliers.

Cripps will also seek to promote equality, diversity and social exclusivity beyond its core business activities by involvement in or sponsorship of suitable community activities under the umbrella of our Corporate Responsibility and Environmental Management Policy.

## **5 RECRUITMENT AND SELECTION**

5.1 Cripps' recruitment and selection process aims to select the most suitable person for the job in respect of experience and qualifications without making assumptions or pre-judgements about the suitability of a candidate based on one of the protected characteristics.

5.2 Recruitment publicity will positively encourage applications from suitably qualified, experienced people and will avoid any stereotyping of roles. All vacancies will be advertised in a wide variety of ways to ensure that a fair cross section of potential applicants have access to the advertisement.

5.3 Questions on the application form will be relevant and non-discriminatory. At interview, no questions will be asked or assumptions made about a candidate's personal, health and domestic circumstances or plans. Where the requirements of the job affect the candidate's personal life (e.g. unsocial hours or travel) this will be discussed objectively. There are limited exceptions when questions about an applicant's health may be asked at interview.

- 5.4 If selection tests are used to ensure that applicants have the skills and aptitude required for the job, all such tests will be valid and reliable and free from any discrimination based on the protected characteristics.
- 5.5 Person and job specifications shall be limited to those requirements which are necessary for the effective performance of the job.
- 5.6 Our selection procedures will be reviewed from time to time to ensure that they are appropriate for achieving our objectives and for avoiding unlawful discrimination.
- 5.7 In accordance with recommended practice the composition of our people and applicants for jobs will be monitored for its diversity on an anonymous basis at all levels. This will include all protected characteristics, where known.
- 5.8 As far as practicable, action will be taken to ensure that the workforce forms a balanced reflection of the various groups within the local community

## **6 STAFF TRAINING AND PROMOTION AND CONDITIONS OF SERVICE**

- 6.1 We will aim to ensure that our people achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria.
- 6.2 Access to training and career development will be made available to all our people having regard to an individual's ability and commitment to attain the required level of performance and taking into account Cripps' requirements. Training needs and career development will be discussed as part of the annual appraisal process.
- 6.3 As far as practicable, positive action will be taken, to assist disadvantaged individuals to reach their full potential by providing appropriate training, education or practical assistance.
- 6.4 The conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all our people who should have access to them and that there are no unlawful obstacles to accessing them.

## **7 TERMINATION OF EMPLOYMENT**

- 7.1 Selection for redundancy or the termination of employment will be based on objective criteria and best practice and will not be based on discriminatory criteria.
- 7.2 Disciplinary procedures and penalties will be applied without discrimination.

## **8 BREACHES OF THE POLICY**

- 8.1 If any of our people believe they may have been discriminated against, they are encouraged to raise the matter through our Grievance Procedure (#1828226).
- 8.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the Grievance Procedure. People who raise potential breaches in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will be dealt with under the Disciplinary Procedure.
- 8.3 Any of our people who are found to have committed an act of discrimination or harassment will be subject to action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal in the case of an employee.

## 9 **REVIEW OF THE POLICY**

The policy will be reviewed by the Head of HR on an ongoing basis to reflect changes in the law, demographics and internal business requirements. People are invited to comment on this policy and suggest ways in which it might be improved by contacting the Human Resources team.

This policy does not form part of any employee's contract of employment and may be amended at any time.

Any queries about this policy should be directed to the Human Resources team.

## Appendix 1

### WHAT IS DISCRIMINATION?

- Discrimination occurs when one person is treated less favourably than another is treated, or would be treated, in the same or similar circumstances without legitimate reason. Discrimination may occur even when unintentional.
- Discrimination on the basis of age, disability, gender re-assignment, marital or civil partnership status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation is unlawful. These are known as the '*protected characteristics*.'
- **Direct discrimination** occurs where one person treats another less favourably because of one of the protected characteristics above. For example, rejecting a Sikh applicant for a senior post because he might not "fit in" with the existing (all white) team.
- **Indirect discrimination** occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. Indirect discrimination can be justified if it can be shown that the provision of the criterion or practice is a proportionate means for achieving a legitimate aim. For example, a requirement to work full time puts women at a particular disadvantage because it is generally accepted that women take the primary childcare role and it is therefore harder for them to work full time. Such a requirement can only apply if it is objectively justified.
- **Victimisation** occurs where an individual is treated less favourably because he/she has taken action to assert their statutory rights not to be discriminated against for one of the protected characteristics or assisted a colleague with information in that regard.
- **Harassment** occurs when one person subjects another to unwanted conduct that has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment. This includes threatening, abusive or insulting behaviour, words or actions which violate the other person's dignity. Harassment may involve physical acts or verbal or non-verbal communications and gestures. Harassment can also occur where it has the defined effect upon the victim, notwithstanding the harasser's intention – it is the effect which the harassment has upon the victim that is important. For example, remarks made humorously or without malicious intent can still constitute harassment as can a one-off act of sufficient severity. Harassment is described in more detail in the Harassment Policy (#964682).