



Equality, Diversity and Inclusion Policy

V1.0 November 2025

ELCAP is committed to the policy of equal treatment of all employees and applicants to promote a culture which actively values difference recognising that people from diverse backgrounds can bring valuable insights to the workplace and enhance the way we do business. ELCAP's aim is to be an inclusive organisation by recruiting, training, promoting and rewarding on the basis of merit and irrespective of the Protected Characteristics detailed in the Equality Act 2010 (age, disability, gender reassignment, marriage or civil partnership, pregnancy & maternity, race (including colour, nationality, ethnic or national origins), religion or belief, sex or sexual orientation) and any other relevant legislation not limited to part time status, trade union membership and political belief or affiliations.

ELCAP is therefore committed to providing equality of opportunity for all employees by:

- Preventing any form of direct or indirect discrimination, victimisation or bullying.
- Promoting a good and harmonious working environment where all individuals are treated with respect and dignity and in which no form of intimidation or harassment from colleagues, customers or clients will be tolerated.
- Fulfilling all legal obligations under relevant legislation and associated Codes of Practice where they apply.
- Exceeding legal requirements to ensure that every person will be treated with fairness, respect and in a way that is non-discriminatory.

You must be aware of the importance which ELCAP attaches to this policy, and must ensure that you do not, by your own actions, behaviour or attitude, directly or indirectly or unintentionally discriminate against any job applicants, employees, customers or clients. Any act of discrimination will be treated as a disciplinary offence and these will include for example, discrimination in selecting, promoting or training, refusing to work with or for a person because of any of the reasons stated in paragraph one of this policy and harassment of any employee, customer or client.

This policy applies to all individuals working at all levels, trainees, home-workers, casual workers, volunteers, agency employees, contractors and all job applicants.

Commitment

Equality, Diversity and Inclusion are at the heart of how we do business. We recognise the importance of making full use of people's talents and skills by creating an open and inclusive workplace culture where people from all backgrounds can work together with dignity and respect. We also recognise the importance to individuals to feel that they are being encouraged and developed to their full potential.

Steps we will take to ensure that we are fulfilling our responsibilities and promoting good practice include:

- Complying with legal obligations in a transparent manner.
- Assessing the impact of policies and practices to identify, remove or mitigate any disadvantage to underrepresented groups.
- Taking measures to eliminate discrimination.
- Take positive action to redress any imbalances identified by the monitoring carried out.
- Fostering good relations between people who share a Protected Characteristic and those who do not.
- Promoting awareness and understanding of equality, diversity and inclusion matters among employees through policies, training and guidance.
- Ensuring that the Company's property is, as far as possible, welcoming and accessible to all.
- Making sure that reasonable adjustments are made, as appropriate, to enable people with disabilities to overcome barriers in the work environment.
- Ensuring that employees are provided with appropriate tools so that they feel confident to discuss equality, diversity and inclusion issues and raise any concerns they may have.

Responsibilities

Each employee has a responsibility to ensure that the ethos of this policy is put into practice in all areas of work and in any dealings with people external to the Company.

The Senior Management team are responsible for:

- Providing leadership on the Equality, Diversity and Inclusion strategy and policy, acting as overall champions to ensure that the policy is implemented effectively to ensure fairness and inclusion for all and communicating the strategy and policy both internally and externally.
- Ensuring that training on this Policy is included as a core requirement at all levels within the Company.
- Closely monitoring all aspects of equality, diversity and inclusion and taking action where any anomalies are identified to redress the imbalances found.
- Establishing an Action Plan which can be cascaded to all areas of the Company's work.

Managers at all levels are responsible for:

- Lead by example demonstrating and role-modelling acceptable standards.
- Supporting their employees in meeting the aims of this policy.
- Ensuring that all employees participate in the training provided.
- Taking practical steps to implement and support this policy.
- Ensuring that any complaints or grievances are dealt with fairly, in accordance with the Disciplinary Policy and Grievance Policy.
- Implementing the policy as part of their day-to day management of employees and in applying employment policies and practices in a fair and equitable way.
- Ensuring equality, diversity and inclusion issues are addressed in performance.
- Ensuring vacant posts are advertised to a diverse range of potential candidates including particular groups that have been identified as disadvantaged or underrepresented in ELCAP and taking positive action to recruit disabled people by ensuring there are no unlawful barriers or unnecessary obstacles to applying or accessing equal opportunities, training, development, benefits and/or facilities.

- Effectively managing and dealing promptly when investigating issues relating to potential discrimination, including those matters concerning employees, members of the general public or other stakeholders.
- Ensuring all policy or service decisions that will change provisions, practices or policies and affect the workforce are Equality Impact Assessed and
- Being aware of any Action Plan set by the Senior Management Team and ensuring that this is imbedded into the work of their own department.

The Employees' Responsibilities

All employees have a responsibility to guard against any form of discrimination and avoid any action which goes against the spirit of this policy. Employees at all levels must ensure that there is no discrimination in any of their decisions or behaviour. This includes the provision that you must:

- Implement the policy in your day-to-day work and your dealings with colleagues, customers and visitors.
- Being aware of any Action Plan for your own team and your part in its implementation.
- Ensure your behaviour is appropriate to the policy and that you treat people with respect and dignity.
- Not discriminate against other employees, volunteers or worker, and
- Notify your line Manager of any concerns with regard to the conduct of other employee, volunteer, customer, supplier, the public or third parties.
- Suggest further ways that this policy can be further improved.

Definition of Equality, Diversity and Inclusion

Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment, and to goods and services, the basis of which is supported and protected by legislation. It should be noted that this does not mean treating everyone 'the same'. What it does mean is recognising that everyone has different strengths and needs which need to be addressed to ensure everyone has the same opportunities to fulfil their own potential free from discrimination.

Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contribution which is beneficial not only for the individual but for the Company.

Inclusion is where people's differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters, and they are able to perform to their full potential, no matter their background, identity or circumstances.

Equality, Diversity and Inclusion are not inter-changeable but inter-dependent. There can be no equality of opportunity for all if differences are not recognised, valued, harnessed and taken account of. ELCAP will actively support Equality, Diversity and Inclusion to ensure all our employees are valued and treated with dignity and respect and encouraged to reach their full potential,

The key benefits of adopting an Equality, Diversity and Inclusion Policy are to:

- promote fairness in access to employment opportunities.
- attract employees and to retain existing employees.
- gain a diversity of talent and experience.
- ensure that every employee has the opportunity to develop their potential.
- provide fair and equitable services to customers/clients.
- ensure legal compliance, particularly with regard to the Company's responsibilities under health and safety and to the common law duty of care.

If you believe that you or one of your colleagues has suffered discrimination you must raise this immediately with your Manager and/or through the Grievance procedures or Anti Bullying, Harassment and Stalking Policy.

Definitions of Types of Discrimination

Direct Discrimination

Unlawful direct discrimination occurs when a person is treated less favourably than another because of one or more of the Protected Characteristics. These Protected Characteristics include gender, disability, sexual orientation, marriage or civil partnership, pregnancy & maternity, gender reassignment, age, religion or belief, race, which includes colour, nationality and ethnic or national origins. Direct discrimination, for example, can occur where a woman is refused a job, training or promotion because she is pregnant.

Indirect Discrimination

Unlawful indirect discrimination is when a provision, criterion or practice is applied to all people but which, in practice, is such that fewer people in certain groups are able to comply and it cannot be shown to be a proportionate means of achieving a legitimate aim. Some practices may look fair but have an unintended discriminatory effect. For example, if ELCAP made a GCSE English qualification a requirement as selection criteria. This would have a disproportionate adverse impact on people educated overseas and may not be justified if all that is required for the job is to demonstrate a level of literacy or the ability to communicate with others. The necessary level of literacy can be tested or checked in other ways that are more relevant to the job.

Victimisation

If any employee is victimised (treated unfairly) because they have supported another person who has a Protected Characteristic, that employee will have the same protection as if he or she had that Protected Characteristic.

For example, one person gives a statement confirming that they witnessed the other employee being harassed due to their race. The witness is then victimised, and pressure is brought in an attempt to get them to withdraw the statement. The witness will then be protected in the same way as the original employee who was being harassed.

Associative Discrimination

This is where a person is discriminated against because they have an association with someone who has a particular Protected Characteristic. For example, a non-disabled person is discriminated against because of the action they need to take care of disabled dependent.

Discrimination by Perception

Discrimination against a person because the discriminator **thinks** the person possesses a particular Protected Characteristic, for example, a person is not shortlisted for a job on the basis that the recruiter assumes the applicant does not have the correct VISA to work in the UK as they have a foreign looking name on their application form.

Harassment

Harassment is defined as unwanted conduct which can be physical, verbal or non-verbal that either violates a person's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person. ELCAP will not tolerate harassment on the grounds detailed in the Equality Act 2010 (gender, gender reassignment, race, which includes colour, nationality, ethnic or national origins, disability, sexual orientation, age, religion or belief.) It may be persistent or an isolated incident. It can take many forms, from relatively mild banter to actual physical violence.

You may not always realise that your behaviour constitutes bullying or harassment but you must recognise that what is acceptable to one person may not be acceptable to another.

ELCAP has a separate [Anti-Bullying, Harassment and Stalking](#).

Time off for Religious Observance

ELCAP will consider any request made for time off to observe particular religious commitments with sensitivity and sympathetically. For example, if you need to be home by a certain time on Friday or Saturday to observe the requirements of your faith, ELCAP will review your duties to see if it is feasible to accommodate this request. Where possible, such requests will be agreed and time may be taken as unpaid time off or made up at a different time which suits the Company.

If the work simply cannot be done at another time, then ELCAP will be unable to agree to the request as it would mean that the business operation would suffer. The same type of consideration will be given to practising Christians who may not wish to work on Sunday or to refrain from working at Christmas or Easter.

Consideration will also be given to the locations and the timings of meetings and functions. ELCAP will treat employees' beliefs and religion with sensitivity. For example, locations for business meetings will be checked regarding alcohol if one of the individuals required to attend the meeting follows a doctrine which prevents him or her from attending meetings at such a place. The timing of routine meetings will, as far as possible, not be arranged when employees who follow a particular religion would be unable to attend due to that religion.

Some religions require their followers to pray at specific times during the day. ELCAP will allow time off for quiet prayer which can be taken at times convenient to the business and in a convenient place. This time will be unpaid unless it can be made up at a time which is convenient to the Company.

If you request time off for religious practices, such requests will be treated with sensitivity, and your duties and the impact on the business considered carefully.

If you wish to make a request under this section of the policy, you should talk to your line Manager who will discuss your requirements to see if these can be accommodated.

Using Holidays

Sensitive consideration will be given to requests to take holiday (or unpaid leave or flexitime) to observe religious holidays. Wherever possible, ELCAP will agree to these requests. However, if ELCAP has a legitimate business reason for refusing any request then this will be the outcome as ELCAP is permitted to make these decisions based on the need to operate the business effectively. If requests are made with as much notice as possible being given it may be more likely that these can be accommodated and planned for in the business work schedule.

Religious and Cultural Dress

You may wear appropriate religious and cultural dress (for example, clerical collars, head scarves, skullcaps, turbans, burqa, hijab) unless it creates a health and safety risk to yourself or any other person, or otherwise breaches this policy.

For operational and health and safety reasons, you may have to be flexible in some circumstances. However, the Company's policy is to ensure that any such restrictions regarding clothing to be worn in an operational environment are genuine requirements on grounds of operational effectiveness or health and safety.

Where necessary management can give further information and guidance on cultural and religious dress in the workplace.

Procedure for Dealing with a Complaint of Unlawful Discrimination

Complaints about, or reports of, discriminatory behaviour or harassment should be made through ELCAP [Grievance procedure](#).

Complaints should be raised as soon as possible so that the matter can be dealt with quickly. The matter should be raised first with your line Manager. If this would cause embarrassment or if you feel it is inappropriate, for example if your line Manager is the subject of the complaint, then the matter should be raised with another, more senior Manager.

If you experience any discriminatory behaviour from a third party such as customers or clients, you should raise the matter immediately with your line Manager or any other Manager present at the place of work. The matter will be treated seriously, and the Manager will carry out a full investigation.

Accusation of Unlawful Discrimination

Any accusations of unlawful discrimination will be investigated fully by the Company. As part of the investigation, you will be given every opportunity to answer the allegation and provide an explanation of your actions.

Once the investigation is complete, if ELCAP finds that no unlawful discrimination occurred, no further action will be taken. However, if ELCAP decides that your actions amount to unlawful discrimination, you may be subject to disciplinary action up to and including summary dismissal for gross misconduct.

If, after the investigation is complete, it is found that the claim was false or malicious, disciplinary action may be taken against the employee who raised the complaint.

Equal opportunities practice is constantly developing as social attitudes and legislation changes. ELCAP will keep its policies under review and will implement changes where these could improve equality of opportunity.

Recruitment and Selection

This is a key area where anti-discriminatory practice can make a difference. It is important that ELCAP recruits the best person for each vacancy that arises.

All advertisements, job descriptions and the short listing and interview procedures should take cognisance of the Company's Equality, Diversity and Inclusion Policy. Please note that special consideration should be applied when drawing up the section relating to knowledge, skills and experience. The key points are to be objective, be clear about the role and avoid unfair assumptions (E.g. that women will have childcare issues).

ELCAP will undertake a periodic review of the Equal Opportunities Monitoring forms and any feedback or complaints arising during the recruitment and selection process will help to amend any practices and make any necessary adjustments.

Learning and Development

ELCAP believe that all employees should be given the opportunity to undertake learning and development as part of the Company's commitment to continuous professional development.

Specific ways to encourage diversity through training and development include:

- Providing appropriate training for all employees involved in the recruitment and selection process and to those who may provide feedback to candidates.
- Offering Diversity training as part of the induction process and updating all employees on any changes to practices or legal framework affecting this policy.
- Having regular refresher training on diversity so that it is maintained as a crucial part of how ELCAP operates.
- Encouraging awareness of all sections within ELCAP through initiatives including secondments, mentoring, attending presentations, occasional hot-desking, and development days
- Allowing all employees, the opportunity to fulfil their potential through ongoing development in accordance with the Performance Management procedures.

Disability Discrimination

The Disability Discrimination Act was passed in 1995 and is included in the Equality Act 2010. As well as dealing with issues that may occur in employment it also places an obligation on service providers to ensure that disabled people are able to use their services. This also means that reasonable adjustments have to be made to buildings so those physical barriers do not prevent disabled people from accessing services.

The installation and use of induction loops, text phones, appropriate use of colour contrast, low level reception desks, and having information available in large print, tape or Braille can help to meet these requirements.

The Equality Act compels ELCAP to think how it offers its services in ways that allows disabled people to have access as well as considering what needs to be done to facilitate the employment of disabled people.

ELCAP is committed to make every effort that should any employee become disabled they will stay in employment. Should a candidate with a disability apply for any vacancy within the Company, they will be considered on their ability not their disability.

Reasonable Adjustments due to Disability

If you have a condition that is regarded as a disability, ELCAP will be as flexible as possible by discussing any reasonable adjustments with you so that the workplace is comfortable and accommodates your requirements.

This will also include any adjustments to the dress code followed by the Company.

If you would like to discuss any adjustments, you should talk to your line Manager in the first instance.

Implementation, Monitoring and Review

While it is important to have a policy on Equality, Diversity and Inclusion, it is equally important to have a robust monitoring system with checks and balances in place so that any issues can be highlighted. This also allows management to identify where there may be areas of institutional discrimination happening which may not be as obvious as individual occurrences. A result of any monitoring will be published along with any action plan devised to address the imbalances shown.