



CCS Group Limited and its subsidiaries, Cleshar, ITS and GPX, are committed to opposing all forms of discrimination and disadvantage within the workplace. We support the right of everyone to be treated fairly and with dignity and respect and to work in an environment free of discrimination, harassment and victimisation. This is founded on our Group value messages of respect, integrity and honesty and our commitment to considering the rights of others.

We aim to create a totally inclusive environment that respects the diversity of staff and enables every individual to derive maximum benefit and satisfaction from working for the Group. We value everyone and appreciate and welcome the experiences and benefits that a diverse workforce brings.

Our policy underpins all other Group policies, management plans, strategies, and procedures.

In implementing the Policy, we ensure that:

- All employees of the Group, and all third parties working on behalf of the Group and on Group premises, are fully aware of and promote the policy and its principles
- Where necessary, employees undertake appropriate training to increase their understanding of diversity, equality and inclusion
- All employees take personal responsibility for implementing equality and diversity principles, treating all colleagues, customers, suppliers, subcontractors and the public with fairness, dignity and respect, and respectfully challenging unwelcome or unacceptable behaviour by others
- All equality and diversity processes comply with anti-discriminatory legislation and codes of practice, in particular, the Equality Act 2010 and Human Rights Act 1998

The Group is committed to providing employees with equality of opportunity in all areas of employment and business regardless of age, gender identity, ethnicity or race, nationality, disability (both physical and mental) religion or beliefs, sexual orientation, marital or civil partnership status, working patterns, caring responsibilities, pregnancy, political affiliation or trade union membership.

This commitment applies to all aspects of employment, teaching and learning, including:

- Recruitment and selection, including advertisements, job descriptions, interview, and selection procedures
- Induction and probation for staff
- Staff appraisal
- Remuneration
- Promotion and training
- Disciplinary and grievances
- Recruitment, selection, and enrolment of learners
- Curriculum content and development
- Course delivery and assessment
- Teaching and learning materials and methods
- External contracts
- Self-Assessment
- Learner disciplinarys
- Selection for redundancy

To achieve this, our objectives are to:

- Be an exemplary equal opportunities employer across all our activities, and at all times
- Maximise the opportunities that enable diverse talent to join and remain in the Group
- Maintain a working environment where discrimination, harassment, victimisation and bullying are not tolerated, and support this with a well-defined grievance procedure
- Implement a fair and open-to-all recruitment process, maximising our chances of recruiting the best possible talent
- Ensure remuneration, benefits and terms and conditions are agreed in a fair, unbiased and objective manner
- Actively encourage representatives of the community in which we do business and, in particular, members of underrepresented groups to apply for employment opportunities
- Provide equal access to all training and career opportunities, enabling individuals to develop to their full potential



- Ensure our performance management systems, including appraisals and promotions, are applied equitably and do not disadvantage certain groups or individuals
- Increase awareness of our commitment to equality and diversity among our own employees and our customers, suppliers and subcontractors
- Monitor recruitment, training and promotion on a regular basis, ensuring that we meet our goals to attract talent from all sections of the community
- Review all Group processes and procedures regularly to ensure that they do not unfairly discriminate
- Breaches of this policy will be regarded as misconduct and could lead to disciplinary proceedings

Diversity and Inclusion

We will not tolerate discrimination on any grounds. The following are examples of discrimination:

Direct Discrimination, where a person is treated less favourably on the grounds of race, racial group, colour, ethnic or national origins, sex, pregnancy, age, marital status, disability or sexual orientation or religion or belief.

Indirect Discrimination, where an apparently neutral provision, criterion or practice would put a substantially higher proportion of the members of one sex, or persons having a racial or ethnic origin, or a particular religion or belief, or a particular disability or a particular sexual orientation, or age group at a particular disadvantage compared with other persons unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

Discrimination by Association or Perception, where a person is treated less favourably or detrimentally due to association with someone who has one of the protected characteristics or are perceived to have.

Victimisation, where someone is treated less favourably than others because he or she has taken action against the practice under one of the relevant Acts.

Harassment, when unwanted conduct related to any of the grounds referred to above takes place with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may involve physical acts or verbal and non-verbal communications and gestures. This will include physical, verbal and non-verbal acts – please see the Company's Harassment Policy for further details.

Promotion of policy

CCS will promote this policy to all employees as part of the induction process. Promotion to learners/apprentices will form part of their induction process. This policy is made available via our website, notice boards in all centres/locations and in the handbooks for learners/apprentices and employees. It should be read in conjunction with the Group's Workplace Harassment Policy, Business Ethics Policy and Human Rights Policy.

Implementing the policy

Ultimate responsibility for ensuring the awareness of and compliance with this policy rests with the owner of the Company, who has overall responsibility for the operation and implementation of the policy.

All employees, consultants and owners of the company are aware of and expected to pay due regard to the provisions of its Equality and Diversity policy and are responsible for ensuring compliance with it on a day-to-day basis when undertaking their jobs or representing the company.

Acts of discrimination or harassment by employees or consultants or owners of the company are not tolerated and will be taken very seriously and may result in disciplinary action. Failure to comply with this policy will be treated in a similar fashion. The policy applies to all who are employed in the practice, consultants and to the owners and Directors of the company.

Acts of discrimination or harassment on any of the forbidden grounds by those acting on behalf of the company will lead to appropriate action including termination of services where appropriate.

Communicating this policy

All employees or learners/apprentices are instructed to follow the policy as soon as they join the business as part of the recruitment and/or learner induction process. This applies to all people and all aspects of their employment



and/or training journey. The policy is communicated to all staff via our intranet and is reviewed annually to ensure that it continues to reflect the absolute commitment of the Group to embedding equality and diversity in the workplace.

Breaches of this policy will be dealt with under the Disciplinary Procedure.

Review

This policy will be reviewed on an annual basis to measure its progress and judge its effectiveness.

Recorded Data

A key objective of the Group is to measure and monitor the diversity of the workforce. Diversity data is recorded and monitored of all applicants, short-listed applicants and successful applicants for jobs and training contracts.

HR maintain records of the detail, number and outcome of complaints of discrimination made by employees, clients and other third parties. HR will also maintain records of any disciplinary action (if any) taken against employees as a result of failure to comply with this policy.

Michael Hesnan

Joint Managing Director

Andy Redican

Joint Managing Director