Diversity, Equity & Inclusion Policy

Version:	3
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1 Purpose and commitment

We are committed to a workplace where people are treated fairly, with dignity and respect, and can contribute and develop without unlawful discrimination. We value different backgrounds, experiences and perspectives. We will identify and address barriers to opportunity and take practical steps to make our working environment inclusive.

Diversity means recognising and valuing differences between people. Equity means addressing barriers and providing appropriate support so people have fair access to opportunities. Inclusion means creating an environment in which people are respected, heard and able to participate.

2 Scope

This policy applies to directors, employees, workers, agency staff, contractors, interns and job applicants, as relevant to their relationship with the company. It covers recruitment through to leaving the organisation, and conduct towards customers, suppliers, visitors and other business contacts.

It applies at our premises, during remote and hybrid work, at customer sites, on business travel and at work related events. It also covers email, messaging, video calls, social media and other digital communications connected with work.

3 Equality and protected characteristics

We will comply with the Equality Act 2010 and other applicable equality and employment law. We will not unlawfully discriminate because of:

- Age; disability; gender reassignment.
- Marriage and civil partnership; pregnancy and maternity.
- Race, including colour, nationality, and ethnic or national origins.
- Religion or belief; sex; sexual orientation.

The precise legal protections vary by characteristic and circumstance. Our standards of dignity and fairness apply to everyone. We also seek to avoid unfair disadvantage linked to caring responsibilities, working patterns, socioeconomic background or other personal circumstances.

We prohibit unlawful direct and indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment, sexual harassment and victimisation. Protection can also apply to perceived characteristics and association with another person, where provided by law.

4 Fair employment and development

We will base recruitment, pay, benefits, training, promotion, performance management, disciplinary decisions, redundancy selection and dismissal on relevant, objective criteria. We will review requirements and working practices that may create unnecessary barriers.

- Recruitment: use clear role requirements, accessible adverts and consistent assessment criteria. Ask candidates about adjustments and assess their ability to do the role. Keep equality monitoring information separate from selection decisions.
- Pay and progression: apply fair and consistent criteria, uphold equal pay obligations, and provide fair access to development and opportunities, including for part time and remote staff.
- Working arrangements: consider flexible working and leave requests fairly, in line with statutory rights and business needs. Avoid assumptions about commitment or ability based on caring responsibilities, pregnancy or working patterns.

Any positive action must be lawful, proportionate and supported by evidence. We will obtain appropriate advice before using protected characteristics in selection decisions. We will not apply unlawful preferences or quotas.

5 Reasonable adjustments and accessibility

We will make reasonable adjustments where required by law for disabled applicants and staff. We will discuss individual needs sensitively, including needs connected with physical or mental health conditions and neurodivergence, rather than assume what support a person needs.

Requests may be made to a line manager or the policy owner, verbally or in writing. We will consider them promptly, discuss practical options, record agreed arrangements and review whether they work. Adjustments may include accessible recruitment methods, equipment or software, changes to working arrangements, communication formats or duties. The company will pay for reasonable adjustments; individuals will not be charged.

If a requested adjustment cannot reasonably be made, we will explain why and explore effective alternatives. Staff do not need to use the term reasonable adjustment to ask for support. We will also consider inclusive meeting arrangements, accessible communications and reasonable support for religious or belief related needs.

6 Dignity and prevention of harassment

Bullying, degrading language, exclusion, offensive jokes, discriminatory comments, unwanted sexual attention, and sharing offensive material are unacceptable. Harassment can be a single incident or repeated conduct. Behaviour may be unacceptable even where the person responsible describes it as humour or did not intend offence.

We will take all reasonable steps to prevent sexual harassment and harassment by third parties, including customers and suppliers. The policy owner will assess risks, including remote communications, customer contact and social events; implement appropriate preventive measures; provide relevant information and training; and review the effectiveness of those measures.

Managers must act on concerns they observe or receive, including risks reported before an incident occurs. Third party incidents may lead to warnings, changes to contact arrangements, restrictions on access or ending a business relationship, as appropriate. Staff should seek support and may disengage from an interaction where necessary to protect their safety.

7 Raising concerns and handling complaints

Anyone who experiences or witnesses conduct that may breach this policy should raise it promptly with their line manager or the policy owner. A report may be verbal or written. It is helpful to include what happened, when, who was involved and any relevant messages or witnesses, but a lack of evidence must not prevent a concern being raised.

If the concern involves that person, or you feel unable to approach them, contact another director. Where no uninvolved director is available, use the independent reporting contact below. Before this policy takes effect, the company must appoint and communicate an independent contact who can receive concerns involving a director and arrange impartial handling.

Independent reporting contact and contact details:

Mr Peter Lord
Bridge Innovation Centre
Pembrokeshire Science & Technology Park
Pembroke Dock
SA72 6UN

peter.lord@pembrokeshire.gov.uk
01646 689 200

You may raise a formal complaint immediately. You do not have to confront the person concerned or attempt informal resolution. Informal resolution will only be considered where appropriate and with the agreement of the person raising the concern; mediation will not be imposed.

We will acknowledge concerns promptly, assess any immediate support or protective measures needed, and arrange a fair investigation by someone without a conflict of interest. Where internal independence is not possible, we will arrange suitable external support. Both parties will have a fair opportunity to explain their account and respond to relevant evidence.

We will explain the process and expected timescales, provide updates on delays, and communicate the outcome and any appropriate next steps while respecting others' privacy. An appeal may be submitted in writing to the policy owner within 10 working days of the outcome, explaining the grounds. It will be considered impartially by someone not previously involved, using external support where needed. Reasonable extensions will be considered.

Information will be shared only where necessary for a fair process, support or legal obligations; absolute confidentiality cannot be promised. No one will be victimised for raising a discrimination concern, supporting a complaint or giving evidence. A complaint that is not upheld will not, by itself, lead to disciplinary action. Deliberately false allegations may be addressed through a fair disciplinary process. Internal procedures do not remove statutory rights or extend external claim deadlines.

8 Responsibilities and action

Directors are accountable for implementation and resources. The policy owner will communicate this policy, maintain reporting arrangements, organise proportionate induction and refresher training, and keep appropriate records. Managers must apply fair criteria, support adjustments, address concerns and model respectful conduct. Everyone covered must follow this policy, respect others and cooperate with investigations.

Breaches may lead to action under the applicable disciplinary procedure, up to and including dismissal for gross misconduct following a fair process. For contractors or other third parties, appropriate contractual or commercial action may be taken.

9 Monitoring and review

The policy owner will review this policy at least annually and sooner following a material legal change, complaint or identified risk. Review will consider recruitment and employment decisions, access to development, adjustments, staff feedback and complaints, with actions assigned and followed up.

Any equality monitoring will have a clear purpose and lawful basis. Demographic disclosure will be voluntary, information will be restricted and retained only as necessary, and reporting will avoid identifying individuals, especially in a small workforce. We will handle personal data in accordance with applicable data protection law. This policy is non contractual and may be updated after appropriate communication.