

Public

Equality, Diversity and Inclusion Policy

What this policy covers

This policy applies to employees, workers and contractors.

Twin values and actively strives to have a diverse and inclusive workforce in a working environment free from discrimination. An inclusive work culture where people of different backgrounds are valued equally will ensure better outcomes for us all. We continually engage with our staff as well as external partners to help us to understand how we can make our workplace more inclusive and gain an insight into what our staff need most from us.

Twin will seek to promote the principles of equality, diversity and inclusion in all its dealings with employees, workers, job applicants, clients, customers, suppliers, contractors, recruitment agencies and the public.

Everyone who acts on Twin's behalf are required to adhere to this policy when undertaking their duties or when representing Twin in any other guise.

Your entitlements and responsibilities

Unlawful discrimination

Unlawful discrimination of any kind in the working environment will not be tolerated and Twin will take all necessary action to prevent its occurrence.

Specifically, the Twin aims to ensure that no employee, worker or job applicant is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, gender reassignment, race (including colour, nationality, caste and ethnic origin), disability, sexual orientation, marital status, part-time status, pregnancy or maternity, age, religion or belief, political belief or affiliation or trade union membership. This commitment applies to all aspects of employment, including:

- recruitment and selection, including advertisements, job descriptions, interview and selection procedures
- training

- promotion and career-development opportunities
- terms and conditions of employment, and access to employment-related benefits and facilities
- grievance handling and the application of disciplinary procedures
- selection for redundancy,

Equality, diversity and inclusion practice is developing constantly as social attitudes and legislation change. Twin will review all policies and implement necessary changes where these could improve equality of opportunity.

Inclusion

Everyone within the Twin must fully understand and comprehend how this policy will affect them and they must abide by the following when carrying out their duties. When working for or representing the Twin you must:

- ensure that you are always presenting the best of yourself at work and in supporting your colleagues so that we encourage an engaged, welcoming and committed workplace which realises the potential of all involved;
- understand the policies surrounding Equality, Diversity and Inclusion in the capacity of your role and how they affect not only you but your fellow colleagues;
- be receptive and open to differences and where appropriate challenge your own thinking to ensure you do not fall foul of making assumptions about colleagues and/or clients who may be different to you;
- understand the full breadth of the negative impact discrimination of any kind can have on Twin, our clients and your colleagues;
- follow the appropriate channels to challenge behaviours that are not inclusive; and
- ensure that Twin's Equality, Diversity and Inclusion Policy is at the forefront of your mind when dealing with clients in order to respect their differences so that you represent Twin in the correct light.



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Managers

In addition, managers must:

- establish inclusive values throughout your team to ensure differences are being valued and inappropriate behaviour is being challenged swiftly;
- take appropriate action where there is a clear breach of Twin's Equality, Diversity and Inclusion Policy in order to discourage such behaviour and supply relevant training to encourage correct behaviours;
- be a clear role model to the team you manage to demonstrate your own actions and behaviours are in line with those of Twin's inclusion commitment; and
- consider all steps to ensure inclusion is prevalent within every stage from induction to exiting, ensuring that all decisions taken are based completely on merit and that clear opportunities to develop skills and potential is available to all.

Career development

While positive measures may be taken to encourage under-represented groups to apply for employment opportunities, recruitment or promotion to all jobs will be based solely on merit.

Everyone will have equal access to training and other career-development opportunities appropriate to their experience and abilities.

However, Twin will take appropriate positive action measures (as permitted by equal opportunities legislation) to provide specialist training and support for groups that are under-represented in the workforce and encourage them to take up training and career-development opportunities.

Procedure

Complaints of discrimination

Everyone is responsible for the promotion and advancement of this policy. Behaviour, action or words that breach the policy will not be tolerated and could be deemed an act of discrimination.



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Twin will treat seriously all complaints of discrimination made by employees, clients, customers, suppliers, contractors or other third parties and will take action where appropriate.

If you believe that you have been discriminated against, you are encouraged to raise the matter as soon as possible with your manager or other senior manager using Twin's Grievance Procedure (outlined elsewhere in the Employee Handbook). If the Grievance Procedure does not apply, you should raise a complaint to a senior manager.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you make an allegation of discrimination, Twin is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under Twin's Disciplinary Procedures (or other such appropriate measures where the Disciplinary Procedure does not apply).

Investigating accusations of unlawful discrimination

If you are accused of unlawful discrimination, Twin will investigate the matter fully.

During the course of the investigation, you will be given the opportunity to respond to the allegation and provide an explanation of your actions.

If the investigation concludes that the claim is false or malicious, the complainant may be subject to disciplinary action.

If the investigation concludes that your actions amount to unlawful discrimination, you will be subject to disciplinary action, up to and including dismissal without notice for gross misconduct.

Monitoring

Twin may carry out monitoring for the purposes of measuring the effectiveness of its Equality, Diversity and Inclusion Policy.

The policy applies to all Twin Group companies.