



EQUALITY, DIVERSITY AND INCLUSION POLICY

NWH Group Limited
Reviewed- January 2026

Introduction

We are an equal opportunities employer. We are committed to equality of opportunity and providing a service and following practices which are accessible from unfair and unlawful discrimination. This policy aims to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It also seeks to ensure that no person is victimised or subjected to any form of bullying or harassment.

We value people with diverse opinions, cultures, lifestyles and circumstances. This policy covers all employees, and it applies to all areas of employment, including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.

The HR and Compliance Department has particular responsibility for implementing and monitoring the Equality and diversity policy. As part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

All employees, workers, or self-employed contractors, whether part-time, full-time, or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be based on aptitude and ability. All employees will be helped and encouraged to develop their full potential, and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Company.

Equality of opportunity, valuing diversity, and compliance with the law are for the benefit of all individuals in our company as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels are responsible for treating others with dignity and respect. The personal commitment of every employee to this policy and the application of its principles are essential to eliminate discrimination and provide equality throughout the Company.

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Our commitment as an employer

The Company is committed to:

- creating an environment in which individual differences and the contributions of our staff are recognised and valued
- entitling every employee, worker or self-employed contractor to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- providing training, development and progression opportunities to all staff
- understanding equality in the workplace is good management practice and makes sound business sense
- reviewing all our employment practices and procedures to ensure fairness.

Our commitment as a service provider

The Company is committed to:

- providing services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class
- making sure our services are delivered equally and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients
- fully supporting this policy by senior management and ensuring agreement has been reached with employee representatives
- selecting those for employment, promotion, training, or any other benefit purely on the basis of aptitude and ability
- monitoring and reviewing this policy annually
- having clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated
- treating breaches of our equality and diversity policy as misconduct which could lead to disciplinary proceedings
- encouraging all staff to come forward with any issues they need Company assistance and understanding with, no matter their background, identity or circumstances, such as if they are victims of domestic abuse or have caring commitments.

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Equal opportunity policy statements

Age

We will

- ensure that people of all ages are treated with respect and dignity
- ensure that people of working age are given equal access to our employment, training, development and promotion opportunities and
- challenge discriminatory assumptions about younger and older people.

Disability

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities
- challenge discriminatory assumptions about disabled people and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.

Race

We will:

- challenge racism wherever it occurs
- respond swiftly and sensitively to racist incidents and
- actively promote race equality in the Company.

Sex

We will:

- challenge discriminatory assumptions about women and men
- take positive action to redress the negative effects of discrimination against women and men
- offer equal access for women and men to representation, services, employment, training and pay and encourage other organisations to do the same.

Gender reassignment

We will:

- provide support to prevent discrimination against transsexual people who have or who are about to undergo gender reassignment

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- prohibit and respond to all instances of discrimination, both from colleagues and externally.

Sexual orientation

We will:

- ensure that we take account of the needs of lesbians, gay men and bisexuals and
- promote positive images of lesbians, gay men and bisexuals.

Religion or belief

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

Pregnancy or maternity

We will:

- ensure that people are treated with respect and dignity and that a positive image is promoted regardless of pregnancy or maternity
- challenge discriminatory assumptions about the pregnancy or maternity of our employees and
- ensure that no individual is disadvantaged and that we take account of the needs of our employees' pregnancy or maternity.

Marriage or civil partnership

We will:

- ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees and
- ensure that no individual is disadvantaged and that we take account the needs of our employees' marriage or civil partnership.

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Ex-offenders

We will prevent discrimination against our employees regardless of their offending background (except where there is a known risk to children or vulnerable adults).

Equal pay

We will ensure that all employees, male or female, have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value. Please see NWH Equal Pay Policy.

Unconscious bias

The Company recognises the dangers of unconscious bias arising at work, which is where an opinion is formed on an individual by a manager or colleague without them necessarily being aware they have formed it.

There are many different forms of unconscious bias, ranging from an affinity towards those of a similar background to placing too much significance on what has been identified as a negative trait.

The organisation will work against forms of unconscious bias in all decisions taken for employment, including recruitment, promotion and training opportunities, with a focus on promoting diversity and inclusion.

In particular, the Company will implement the following:

- Referring to specific job criteria when making recruitment decisions
- Discounting any favourable personal relationships with staff.
- Making decisions collectively between HR and management.

Types of Unlawful Discrimination

Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. [An example of direct discrimination would be refusing to employ a woman because she is pregnant.]

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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.

Associative discrimination is where someone is directly discriminated against or harassed for association with another person who has a protected characteristic [(although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity)].

Perceptive discrimination is where someone is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when he/she does not, in fact, have that protected characteristic [(other than marriage and civil partnership, and pregnancy and maternity)].

Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. [Harassment is dealt with further in our Anti-harassment and Bullying Policy]. Third party harassment related to gender, sexual orientation, gender reassignment, race, religion or belief, age or disability is also unacceptable.

Victimisation is also prohibited under this policy. This is less favourable treatment of someone who has raised or supported a complaint or raised a grievance under the Equality Act 2010 for discrimination or harassment, or because they are suspected of doing so.

Signed:

Date: 15/01/2025

Gavin Money

Managing Director

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