

Equality and Diversity Policy Incorporating Equality Act 2010

Policy Statement

Cutlass Group Limited (Cutlass), is committed to eliminating discrimination, promoting diversity, and providing equal opportunities, which is demonstrated through our employment policies, procedures, and practices. Our aim is that our workforce will be truly representative of all sections of society, and each person feels respected and able to give their best. All employees have a duty to co-operate to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Disciplinary action will be taken against any employee who breaches this policy and serious breaches will be treated as gross misconduct. All employees will be helped and encouraged to develop their full potential and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

To that end, the purpose of this policy is to provide diversity and equality to all in employment, irrespective of their protected characteristics such as gender, gender reassignment, race, ethnic origin, pregnancy, disability, age, nationality, national origin, sexuality, religion or belief, marital status, civil partnership and social class. We oppose all forms of unlawful and unfair discrimination.

All employees, whether part time, full time or temporary, will be treated fairly, equally (in such a way that the outcome for each person can be the same) and with respect. This can be achieved by putting things in place to support employees and/or applicants to achieve similar outcomes, regardless of their protected characteristics listed above. Selection for employment, promotion, training, or any other benefit will be based on aptitude and ability.

Our Commitment

- To ensure **Cutlass** activities are of high quality and responsive to our client's needs, ensuring that our employees adequately respond to the needs of our client.
- Every employee is entitled to a working environment which promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- To ensure that **Cutlass** fulfils its legal obligations under the equal opportunities legislation and complies with provisions contained in various Codes of Practice.
- The commitment to diversity and equality in the workplace is good management practice and makes sound business sense.
- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Breaches of our diversity and equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- The policy will be monitored and reviewed annually.

Implementation

The responsibility for enforcement of this policy rests with **Humayun Shahzad** (Group Chairman), who will monitor the effectiveness of the policy and associated initiatives. All employees have an obligation to avoid discrimination and promote equal opportunities. The implementations of initiatives in support of the policy are the responsibilities of the Directors, Managers and Supervisors.

This Equality Policy will be reviewed continually to ensure compliance with all relevant legislation.

Breach of the Policy

Cutlass will take seriously any instances of non-adherence to the Equality and Diversity policy by staff. Any instances of non-adherence will be investigated and where appropriate will be considered under the relevant disciplinary policy.

Relevant Legislation

Cutlass has implemented its Equality and Diversity Policy in accordance with current legislation and codes of practice including:

- The Equality Act 2010
- Race Relations (Amendment) Act 2000
- Human Rights Act 1998

Equality & Diversity at Work

To ensure that equality underpins all aspects of our employment policies, procedures, and practices, we aim to:

- Ensure that our employment, training and development policies, procedures and practices comply with this policy and do not discriminate intentionally or unintentionally against any group or individual.
- We intend to become an employer of choice by promoting and developing policies that support a worklife balance, equal pay and ensuring that we maximise employment opportunities for all.
- Monitor our employment processes by age, disability, gender, sexual orientation, religion and race and act to address any inequalities that are apparent. Recruit employees in a manner which is fair and open.
- Ensure employees are aware of their personal responsibility to apply this policy.
- Eliminate discrimination in the provision of training and development to ensure that all employees can realise their full potential and contribute to the company.
- Ensure that all Managers / Supervisors undertake relevant training in equal opportunity issues to raise their awareness, understanding and importance of equal opportunities in the workplace and in-service delivery.
- Promote a culture of fairness and respect in all employment policies, procedures, and practices.
- Provide appropriate training and development opportunities to all employees regardless of protected characteristics.

- Take positive action to encourage under-represented groups to apply for posts or specific training.
- Ensure pay structures reward all employees fairly.
- Recognise that employees have the right to work in a supportive and safe environment free from harassment.
- Ensure that we have in place procedures for equal pay.
- Make reasonable access adjustments, wherever possible, to enable the employment and redeployment of staff with disabilities.

Guidelines for Recruitment

- The governing factor for appointments will be based on merit, competence, and the ability to do the job.
- All jobs will be advertised externally and internally.
- All job advertisements will carry wording designed to encourage applicants from all sections of the community.
- Recruitment literature will describe jobs without gender, race, or disability bias.
- Consideration will be given to using a range of advertising media to encourage and attract applicants from all sections of the community.
- All applicants will be assessed in the same way using the same evaluation and selection criteria.
- Disabled job applicants who meet the essential criteria of the job description will be guaranteed an interview.
- Selection criteria will not be set to unlawfully discriminate (directly or indirectly) on the grounds of gender, gender reassignment, race, ethnic origin, pregnancy, disability, age, nationality, national origin, sexuality, religion or belief, marital status, civil partnership, social class and should solely be related to the requirements of the job.
- Age limits, age requirements or length of service restrictions will not be set as criteria for the job unless they can be justified as they are likely to have a disproportionately adverse effect on women and people from minority communities or if there is a genuine occupational qualification complaint with section 5. (2)(d) of the Amended Race Relations Act 2000.
- Where selection tests are used, tests will be specifically related to the job and in the case of ability tests they should be fully validated to avoid any bias on the grounds of gender, marital status, race or disability.
- The staff responsible for shortlisting, interviewing, and making or recommending an appointment will be clearly informed of the selection criteria and the need for consistency.
- Wherever possible, at least two people will interview applicants and all questions will relate to the selection criteria. No questions will be based on assumptions about roles in the home and the family, or the assumed suitability of different ethnic groups for the post in question.
- Where it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves irregular hours or extensive travel) this will be discussed objectively and will be asked equally of all candidates.

- In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (such as accessible interview rooms or the assistance of a sign interpreter) should be offered to enable candidates to compete on an equal basis.

Monitoring & Evaluation

To ensure we are achieving our policy objectives, we will monitor the effectiveness of our policy by keeping records of our recruitment selections process. We will annually monitor and measure the effectiveness of the policy reviewing our practices where there are shortfalls and developing recommendations and implement them.

The records will contain information such as Gender, Race, Age, Disability, Criminal conviction, and marital status.

- All vacant posts will be open for job-sharing unless considered unsuitable (with regards to maintaining work efficiency) and should be advertised in manner to encourage job sharing.
- Any existing employee or any two existing employees will be able to apply to their manager for a job-share arrangement in respect of their job.
- When an employee becomes disabled because of an accident or illness, reasonable adjustments will be made to seek to ensure the employee continues in the job.
- Where an employee has cultural needs that may appear to conflict with existing work requirements, consideration will be given to varying the requirements especially where it may be that the requirement is unjustifiable. In any such cases, advice should be sought from their line manager.
- Where an employee experiences sexual harassment, this will be viewed as a form of sex discrimination which shall not be condoned or tolerated by the company.
- Female employees are far more likely to suffer from such discrimination, and it can be defined as unwanted conduct of a sexual nature, or conduct based on sex which is offensive to the recipient, which interferes with the recipient's work performance and creates a hostile working environment. The rebuttal of such unwanted conduct is often followed by threatened or actual employment retaliation. An employee experiencing conduct which is believed to be sexual harassment should follow the stages in the complaint's procedures.
- Where an employee experiences racial harassment, this will be viewed as a form of racial discrimination which will not be condoned or tolerated by the company.
- An employee experiencing conduct that is believed to be racial harassment should follow the stages outlined in the complaint's procedure.
- BAME employees are far more likely to suffer from such discrimination (though not exclusively) and it can be defined as an unwanted conduct of racial nature, or conduct based on race, it is offensive to the recipient and interferes with the recipient's work performance creating a hostile working environment.
- All other terms and conditions of employment will not be related to the gender, marital status, ethnic origin, or disability of employees and as far as practicable will not obstruct or limit the employment or promotion of any employee.
- Employees who have recruitment and selection responsibilities and/or who have supervisory responsibilities will undertake training in recruitment, selection, and in equal opportunities to ensure

awareness and fairness in their assessment and selection process enabling them to encourage and promote equal opportunities for all.

Appraisal, Training, Career Development, Promotion & Transfer

- Where posts are internally advertised only (i.e., offering career-development and promotion opportunities to existing employees), the same principles as those governing external recruitment will apply.
- In the case of trainees, merit increment, honoraria, etc. are the criteria on which employees' pay rises through increment will not be based on criteria related to gender marital status, age, disability, or ethnic origin.
- All employees will be encouraged to take suitable opportunities for training and advancement. In areas of work where certain groups are under- represented (especially in senior management), managers will take a pro-active role in ensuring employees from such under-represented staff take up training opportunities that assist their future possible entry into these areas of work.
- Employees who have direct contact with members of the public will undertake training on dealing with service users to ensure awareness of their customer needs and the public at large, ensuring satisfactory service delivery.
- In situations where employees are being re-deployed due to changes in the operational arrangements of **Cutlass** will be free from bias on the grounds of gender, marital status, disability, ethnic origin, and any other protected characteristics.

Dismissal & Redundancy

- In cases where employees are being dismissed, this decision will not be made on grounds of their gender, marital status, disability or ethnic origin and decisions will be made solely in accordance with our Company's disciplinary procedure.
- Intentional, direct, and overt acts of race and sex discrimination, and racial and sexual harassment will be regarded as gross misconduct and therefore a dismissible offence.

Equal Opportunities for All

- This policy also seeks to ensure that our Company does not discriminate on the grounds of age, sexual orientation, trade union activity, religious and political beliefs, poverty, and social exclusion. These areas are not covered by anti-discrimination' legislation or Codes of Practice in way legislation covers all protected characteristics of race, colour, ethnic or national origin, gender, marital status or domestic responsibilities, and disability.
- The objectives and our Equal Opportunities Policy apply equally to these areas as it does for those that have supporting legislation.

General Provisions

- Whilst the overall responsibility for the Policy lies with the Company's Directors, every employee has a personal and legal obligation to avoid discrimination and to promote equal opportunities for all. **Cutlass** will ensure that employees are aware of these obligations. We will regularly examine staffing information through workforce surveys, applications and on any other aspects of personnel activity to ascertain the makeup and experiences of the employees by gender, gender reassignment, race, ethnic origin, pregnancy, disability, age, nationality, national origin, sexuality, religion or belief, marital status, civil partnership, social class and to monitor progress in implementing the Equal Opportunities Employment Policy.
- All personnel policies and procedures, particularly those relating directly to equal opportunities will be regularly reviewed to ensure they are operating in a non-discriminatory manner and are adequately assisting the implementation of the Equal Opportunities Employment Policy.
- Complaints of the discrimination by employees should be raised at an appropriate level of the Grievance Procedure and complaints by job applicants should be made to the Managing Director. Any complaints will be treated seriously, in confidence and sensitively.

If after the grievance process has been completed you do not agree with the outcome, you are able to seek advice from ACS at <https://www.acas.org.uk/> or the Citizens Advice bureau at <https://www.citizensadvice.org.uk/> you may also find it beneficial to seek advice throughout the and not just upon completion of the process.

Equal Opportunity in Service

Customer First Policy

Cutlass takes active steps to provide equal opportunities, in service, delivery and the employment of staff. We are committed to building on our existing achievements through improving our services and employment practices.

Equal opportunities mean that our customers will not be treated less favourably because of their race, colour, national or ethnic origin, gender, marital status, disability, sexuality, age, or religious belief.

We are committed to equal opportunities, both in the delivery of services and the employment of staff. Our commitment to equal opportunities means we will encourage the development of understanding and appreciation of diversity and lifestyles.

We expect our workforce to have a positive attitude to equality issues, treating each other equally and fairly, regardless of their race, colour, national or ethnic origin, gender, marital status, disability, sexuality, age, or religious belief.



Signed:

Review Date:

17.08.2026

Name:

Humayun Shahzad Group Chairman

Date:

18.08.2025