

Equality and Diversity Policy

Introduction

Pacific Support Services is committed to providing services which embrace diversity and that promote equality of opportunity. We also comply with our statutory obligations under the Equal Pay Act 1970.

As an employer, Pacific Support Services is committed to equality and valuing diversity within its workforce.

Our goal is to ensure that these commitments, reinforced by our values, are embedded in our day-to-day working practices with all our customers, and colleagues.

We will provide equality of opportunity and will not tolerate discrimination on grounds of gender, gender identity, pay, marital status, sexual orientation, race, colour, nationality, religion, age, equal pay, disability, HIV positivity, working pattern, caring responsibilities, trade union activity or political beliefs – or any other grounds.

We will demonstrate our commitment by:

- promoting equality of opportunity and diversity within the communities in which we work and with all our partners and workforce
- aiming to build a workforce which reflects our customer base, within the diverse communities in which we work, with the aim of having parity of representation across the workforce
- encouraging recruitment from groups currently under-represented in the department and their career progression once employed
- treating our customers, colleagues and partners fairly and with respect
- promoting an environment free from discrimination, bullying and harassment, and tackling behaviour which breaches this
- recognising and valuing the differences and individual contribution that people make
- providing support and encouragement to staff to develop their careers and increase their contributions to the organisation through the enhancement of their skills and abilities
- building in legislative requirements and best practice to all our service delivery and employee policies and procedures, and supporting these with appropriate training and guidance

Every person working for our company has a personal responsibility for implementing and promoting these principles in their day-to-day dealings with everyone – including members of the public, other staff and management. Inappropriate behaviour is not acceptable.

We will measure and report on the effectiveness of our service delivery and employee policies and processes, in relation to these principles, by building performance monitoring and management information requirements into policy and product development. This information will be used to inform future policy and to enhance business processes.

Staff learning and development

We think it is important that all our people can contribute to the achievement of the department's objectives. Staff have access to learning and development products covering all equality areas.

The Equality and Diversity policy provides a clear framework for translating our policy into action. It outlines the responsibilities of the Managing Directors, Executive Team, managers and individuals to comply with the Equality Act 2010. Both management and Trade Union Side are strongly committed to its full and active implementation.

Pacific Support Services will not tolerate processes, attitudes and behaviour that amounts to direct discrimination, associative discrimination, discrimination by perception indirect discrimination including harassment (harassment by a third party), victimisation and bullying through prejudice, ignorance, thoughtlessness and stereotyping.

Pacific Support Services recognises the importance of monitoring, reviewing and reporting on its equality and diversity policy and practice and to measure progress in meeting our policy statement.

Work/life balance

Pacific Support Services is committed to employees who have commitments outside work, irrespective of whether they have caring responsibilities. Pacific Support Services is committed to helping its employees fulfil their potential at work whilst finding the right work/life balance by offering a Flexible Working Hours Scheme and opportunities to job share where appropriate.

Pacific Support Services aims to improve the working lives of its employees by having a framework of policies such as the Statutory Right to Request Flexible Working, special leave to help with caring responsibilities and domestic emergencies and career breaks. Pacific Support Services is committed to supporting employees with family commitments such as offering family-friendly initiatives as a flexible way to meet childcare costs.

Review and monitoring

Pacific Support Services undertakes monitoring that not only meets statutory requirements but also aims for best practice. This is used to inform and improve our employment practices. If through monitoring any discrimination is identified Pacific Support Services will take corrective action to eliminate it. The monitoring of Pacific Support Services workforce is produced across all areas of employment practice and is discussed at the Equality and Diversity Working Group composed of management and the Trade Union Side, and by the various Action groups.

Such monitoring will be carried out using appropriate statistical analysis, and would normally deal with areas such as race, disability, gender, and age and ensure compliance with legislation. Any resultant statistics and analysis will be kept by the Human Resources Directorate and shared with the trade unions.

In addition, the Staff Survey is conducted regularly in order to gain the views of all employees and includes a section on diversity and the working environment. Pacific Support Services will use the information from the Staff Survey to measure its record on meeting our equality and diversity policy aims.

Training

Pacific Support Services is committed to ensuring its staff and managers are trained in equality and diversity and aims to ensure that adequate training is provided so that managers are able to operate this policy. Examples include specific training on race, gender, gender identity, disability, sexuality, age and religion or belief, in accordance with the requirements of the law and good practice.

Diversity and equality form an integral part of Pacific Support Services induction package. Managers are to ensure that all new entrants are made aware of our Equality and Diversity Policy and Harassment, Bullying and Discrimination policy.

Communication

The Equality and Diversity policy is available upon request. Please contact us if you require a copy in an alternative format. The details of this policy will be proactively communicated and promoted to all current staff and new starters.

Discrimination

Discrimination may take seven main forms and is defined in law along with the protective characteristics associated with each provision as listed below:

- **Direct Discrimination** occurs when someone is treated less favourably than another person because of a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership, pregnancy and maternity. For example, a manager does not select a pregnant woman for promotion even though they meet all of the competencies because they are pregnant. This is probably direct discrimination and cannot be justified
- **Associative discrimination** occurs when someone discriminates against someone because they associate with another person who possesses a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a manager does not give a job-applicant the role, even though they have met all of the competencies for the role, just because the applicant tells the employer they have a disabled partner. This is probably associative discrimination because of disability by association
- **Discrimination by Perception** occurs when someone discriminates against an individual because they think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a manager selects a person for redundancy because they incorrectly think they have a progressive condition (i.e. that they are a disabled person). This is probably discrimination by perception because they believe the individual is disabled
- **Indirect Discrimination** occurs when a seemingly neutral provision, criterion or practice that applies to everyone places a group who share a characteristic e.g. type of disability at a particular disadvantage. Indirect discrimination may be justified if it can be shown that the provision, criterion or practice is a proportionate means of achieving a legitimate aim. An example of this is when an employer decides to apply a "no hats or headgear" rule to staff. If this rule is applied in exactly the same way to every member of staff, then staff who may cover their heads as part of their religion or cultural background (such as Sikhs, Jews, Muslims and Rastafarians) will not be able to meet this requirement of the dress code and may face disciplinary action as a result. Unless the employer can objectively justify using the rule, this will be indirect discrimination. Relevant protected characteristic includes age, marriage and civil partnership, race, religion or belief, sex and sexual orientation. In addition, the Act extends protection against unjustified indirect discrimination to gender reassignment and disability
- **Dual Discrimination** occurs when someone is treated less favourably because of a combination of two relevant protected characteristics. This means that it will be possible for an applicant to claim that they have been treated less favourably not just because of their race but also because of their gender. For example, because the individual is an Asian woman. Relevant protected characteristic include age, disability,

gender reassignment, race, religion or belief, sex and sexual orientation. (At present this new concept has not been implemented)

- **Detriment arising from a disability arises when you treat a disabled person unfavourably because of something connected with their disability.** This type of discrimination is unlawful where the employer or other person acting for the employer knows, or could reasonably expected to know, that the person had a disability. This type of discrimination is only lawful if the action can be justified, and the employer can show that is a proportionate means of achieving a legitimate aim. An example of this when an employer imposes a “no beards” rule as a part of a dress code and tells staff they will be disciplined if they do not comply. The employee is a disabled person who has a skin condition which makes shaving very painful. They have been treated unfavourably (threat of disciplinary action) because of something arising from their disability (their inability to shave). Unless the employer can objectively justify the requirement, this may be a detriment arising from a disability. It may also be a failure to make a reasonable adjustment
- **Victimisation** occurs when an employee is treated unfavourably, disadvantaged or subjected to a detriment because they have made or supported a complaint of discrimination or raised a grievance under the Equality Act, this policy or the Harassment, Bullying and Discrimination policy or because they are suspected of doing so. (However, an employee is not protected from victimisation if they have maliciously made or supported an untrue complaint). An example, of this is when an employee requests to work flexibly, and their manager refuses their request because they supported a colleague in a complaint of discrimination
- **Third Party Harassment** occurs when an employee is harassed by someone who does not work for the employing organisation such as a customer, visitors, client, contractor or visitors from another organisation. The employer will become legally responsible if they know an employee has been harassed on two or more occasions by someone and it may also be different individuals each time and fails to take reasonable steps to protect the employee from further harassment

Complaints of Discrimination

Pacific Support Services takes all claims of discrimination very seriously and will take appropriate action against those concerned. Discrimination occurs when someone directly or indirectly treats a person or a group of people unfavourably because of a protected characteristic of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. This covers all behaviour including remarks and insinuation, both verbal and non-verbal, which cause offence.

Any member of staff who is subject to harassment, bullying or discrimination is encouraged to refer to Pacific Support Services policy on Harassment, Bullying and Discrimination. This provides details of the steps that can be taken to deal with such an issue. In addition, staff are reminded that they can obtain external, confidential help if they so wish by contacting Pacific Support Services. If a worker (engaged through, or by, an employment agency or bureau) considers they have been discriminated against they should raise their complaint directly with their employer.

People Strategy and Corporate Social Responsibility

Pacific Support Services aims to be an employer of choice and through its People Strategy aims to ensure its workforce are able to make a valuable contribution to the work of the Schools and Offices whilst ensuring we support our workforce's health and well-being of the workforce.

Responsibility

All staff have a responsibility to guard against any form of discrimination and avoid any action which goes against the spirit of this policy. Thus, staff at all levels must ensure that there is no discrimination in any of their decisions or behaviour. This includes the provision that all staff must:

- report any suspected discriminatory acts or practices
- not induce or attempt to induce others to practice unlawful discrimination
- co-operate with any measures introduced to ensure equality of opportunity
- not victimise anyone as a result of them having complained about, reported or provided evidence of discrimination
- not harass, abuse or intimidate others

However, whilst all staff have a collective responsibility to ensure this policy is successfully implemented, there are also specific responsibilities within this.

The Managing Director and the Executive Team are responsible for:

- Providing leadership on the equality and diversity strategy and policy, acting as overall champions to ensure the policy is implemented
- Communicating the strategy and policy, internally and externally
- Strategic engagement with and accountable to the public

Managers at all levels are responsible for:

- Implementing the policy as part of their day-to-day management of staff and in applying employment policies and practices in a fair and equitable way
- Ensuring equality and diversity issues are addressed in performance
- Ensuring all staff act in accordance with the equality and diversity policy providing necessary support and direction
- Effectively manage and deal promptly when investigating issues relating to potential discrimination, including those matters concerning members of the general public who use Pacific Support Services
- Ensuring all policy or service decisions that will change provisions, practices or policies and affect the workforce are Equality Impact Assessed as required. For further information refer to the Equality Impact assessment policy

Each employee is responsible for:

- Implementing the policy in their day-to-day work and their dealings with colleagues, readers and visitors
- Ensuring their behaviour is appropriate to the policy and that they treat people with respect and dignity
- Not discriminating against other employees or service users
- Notifying their line manager of any concerns with regard to the conduct of other employees, service users, the public or third parties

Human Resources are responsible for:

- Developing employment policy and strategy on equality and diversity
- Providing guidance to line managers and staff
- Supporting managers in investigating issues relating to potential discrimination, including those matters concerning members of the general public who use Pacific Support Services
- Monitoring employment policies and practices
- Championing the issues, internally and externally
- Facilitating training and development initiatives on equality and diversity, both at corporate and directorate level

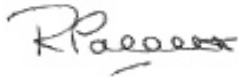
Non- Compliance with Policy

Pacific Support Services will not tolerate any behaviour from staff which breaches our equality and diversity policy. Any such breaches will be regarded as misconduct except for serious offences such as discrimination on protected grounds; serious offences including harassment, bullying, or victimisation will be treated as gross misconduct and may lead to disciplinary action including dismissal from employment without notice.

Policy Responsibility

Human Resources have the responsibility for ensuring the maintenance, regular review and updating of this policy. Proposed changes to the policy will follow the process as described in our staff handbook.

Signed



Mr Richard Pallett MBICSc
Managing Director

Reviewed: November 2025

Next review Date: November 2026