

## Equality and Diversity Policy

**DOCUMENT CONTROL**

DATE	Revision/Details/Reason	Author
16/11/21	04/Format edited; doc control added	TA
01/04/22	05/Updates following further review	TA

The policy was approved on 24/02/2020, following a policy review consultation with Directors, Associates, Project Managers and staff.

Overall responsibility for the implementation of the policy lies with Toby Adam (Director). For more information, please contact this person:

Signed 

Position: Director

Last reviewed: 01/04/22  
Next review: April 2023

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## **Statement of Intent**

*Gaunt Francis Architects welcomes its responsibilities under the Equality Act 2010 and is committed to meeting them.*

*Gaunt Francis Architects is committed to building an organisation that makes full use of the talents, skills, experience, and different perspectives available in diverse society, where people feel they are respected and valued, and can achieve their potential, no matter what their background or characteristics<sup>1</sup>.*

*We seek to ensure a work environment where we treat all employees as individuals, fairly and in a consistent way. We will promote a culture of respect and dignity and actively challenge discrimination, should it ever arise.*

*We recognise that to achieve this we also need to deliver our services in ways that are appropriate to everyone and, where possible, to remove barriers that limit access to our services and employment opportunities.*

*We will continue to support our leaders, managers, and employees to demonstrate the principles of diversity and inclusion in their everyday activities, roles, and functions.*

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<sup>1</sup> This refers to the protected characteristics of sex, gender reassignment, race, disability, age, sexual orientation, religion or belief, marriage and civil partnership and pregnancy and maternity.

## **Purpose**

This policy sets out Gaunt Francis' approach to equality and diversity. GFA is committed to promoting equality and diversity and promoting a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work.

Gaunt Francis aims to be an inclusive organisation, committed to providing equal opportunities throughout employment including in the recruitment, training and development of employees, and to pro-actively tackling and eliminating discrimination.

## **Equality and Diversity at Gaunt Francis**

At Gaunt Francis, we consider that equality means breaking down barriers, eliminating discrimination and ensuring equal opportunities and access for all groups in accessing our services and employment opportunities.

We consider diversity to mean celebrating difference and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but for Gaunt Francis too.

We acknowledge that equality and diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed.

We consider 'Inclusion' to mean fully accepting everyone's right to feel like they belong in our organisation and providing the support to enable everyone to have opportunities to be included in its activities.

## **Scope**

The rights and obligations set out in this policy apply equally to all employees, whether part time or full time on a substantive or fixed-term contract, and to associated persons such as agency staff, contractors and others employed under a contract of service.

All staff have personal responsibility for the application of this policy. As part of Gaunt Francis' employee induction, staff are expected to read and familiarise themselves with this policy, ensure that this policy is properly observed and fully complied with.

This policy is also of relevance to directors, line managers and other employees concerned with recruitment, training and promotion procedures, and employment decisions which affect others.

This policy is non-contractual and maybe updated at any time.

## **Gaunt Francis' Commitment**

Every employee is entitled to a working environment that promotes dignity, equality, and respect for all. Gaunt Francis will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, contractor, job applicant or visitor because of a protected characteristic:

- sex;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race (including ethnic origin, nationality and national origin);
- disability;
- sexual orientation;
- religion and or belief (including lack of belief); and
- age.

No form of intimidation, bullying or harassment will be tolerated. For types of discrimination see the Annex to this policy.

**We will strive to achieve these commitments by:**

Training managers and all other employees about their rights and responsibilities under the equality policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation, and unlawful discrimination.

Ensuring that this policy has been made available to all employees throughout the organisation and is shared with recruitment agencies, agency staff and contractors.

Internal training programmes incorporate raising awareness of the Gaunt Francis' Equality and Diversity policy wherever practical.

Providing Grievance procedures for any employee who believes they have been treated unfairly or subjected to discrimination, harassment, bullying or victimisation.

Following Gaunt Francis' **Disciplinary Policy** and procedure in cases where there has been a breach of this policy.

Procuring goods and services only from organisations that demonstrate a commitment to meet the requirements of the Equality Act 2010.

Ensuring equality of opportunity in employment.

All activities and operations undertaken by Gaunt Francis shall be subject to this policy.

### **Working Environment**

All individuals have a right to be treated with dignity and respect and the Company takes reasonable steps to protect staff from discrimination, bullying or harassment and, in the event of a complaint, we will take appropriate action to prevent, as far as possible, a further occurrence.

All staff are encouraged to report any incidents of inappropriate or unacceptable behaviour at work or that occurs during employment, on or off premises, including at work social events (whether organised by the Company or not) or at formal or informal events involving staff, customers or other work-related contacts.

The Company has a separate **Anti Bullying & Harassment Policy** and procedure for dealing with such complaint.

## Terms and Conditions

Our terms and conditions of service will be applied fairly, and benefits and facilities will be made available to all staff who should have access to them, as appropriate.

The Company operates a pay and benefits system that is transparent, based on objective criteria and free from bias to ensure that all employees are rewarded fairly for their contribution and loyalty.

Terms and conditions of employment for part-time employees will be provided on a pro-rata basis to full-time employees. Similarly, the terms and conditions for fixed term employees will be comparable with those given to permanent employees, except when different treatment can be objectively justified.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. Gaunt Francis will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably by Gaunt Francis as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under Gaunt Francis' Discipline Policy.

A person found to have breached this policy may be subject to disciplinary action under Gaunt Francis' Disciplinary Policy.

Employees may also be personally liable for any acts of discrimination prohibited by this policy that they commit, meaning that they can be sued by the victim.

## When Does This Policy Apply?

This policy applies to all conduct in the workplace and also outside of the workplace that is work related (e.g. at meetings, social events and social interactions with colleagues) or which may impact on Gaunt Francis' reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to Gaunt Francis).

We set out below some specific areas of application:

### a) Recruitment

Recruitment is typically made through recruitment agencies. Any agencies involved in Gaunt Francis' recruitment will be made aware of Gaunt Francis' equality policy, as well as other relevant policies. Selection for employment at Gaunt Francis will be based on aptitude and ability. We will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled job applicants are not disadvantaged.

### b) Training

You may also be required to participate in training and development activities from time to time, to encourage the promotion of the principles of this policy.

### c) Promotion

All promotion decisions will be made based on merit and will not be influenced by any of the protected characteristics listed above. Promotion opportunities will be monitored to ensure

equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.

#### **d) During employment**

The benefits, terms and conditions of employment and facilities available to Gaunt Francis employees will be reviewed on a regular basis to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the special needs of disadvantaged or under-represented groups. Discrimination based on work pattern (part-time working, fixed term contract, flexible working) which is unjustifiable will also not be tolerated.

### **Employment Policies and Practices**

Gaunt Francis aims to ensure that employment policies and practices, including any rules or requirements, do not directly or indirectly discriminate and are applied in a non-discriminatory manner. We will ensure that all disciplinary decisions are fair and consistent and that any selection for redundancy is based on objective criteria.

Gaunt Francis will consider making appropriate reasonable adjustments to the working environment, work arrangements, workstation that would alleviate or remove any disadvantage these may cause staff who are disabled.

We will aim as far as reasonably practicable to accommodate the requirements of different religions and cultures including dress code and time off for religious events.

We will consider requests from employees to vary or change their working pattern to enable them to balance their work and home lives, for example, to care for a dependant. Such requests will be considered in accordance with the Company's **Flexible Working Policy**.

Organisational communications processes will be undertaken in order that everyone is included and provided with access to the information they need to enable them to perform their roles within the organisation. This includes employees who work in a non-full-time way; those on family leave, such as maternity, paternity, adoption, parental and shared parental leave (see the Company's leave policies); those employees with disabilities; and those whose first language is not English.

In trying to accommodate individuals' needs, where relevant the Company may need to do so in accordance with its **Health and Safety Policy** and its legal duty of care to all employees.

### **Training**

GFA 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 can 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 the GFA induction package. Managers are to ensure that all new entrants are made aware of this **Equality and Diversity Policy**.

## Communication

This **Equality and Diversity Policy** is available on the GFA intranet and external website. Please contact HR Administration 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.

## How Equality Issues are Reviewed or Monitored

We will review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

We will monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy.

We will review this policy at regular intervals not to exceed a period of 12 months.

## Action Plan for Improving Equality & Diversity

By April 2023, we will:

Collect data on gender pay gap and benchmark against other UK architectural practices using the RIBA Chartered Practice benchmarking toolkit.

Collect data on the make-up of our workforce and benchmark against other UK architectural practices using the RIBA Chartered Practice benchmarking toolkit.

Provide alt-text for all images on our website to improve automated readability and legibility for sight-impaired visitors.

Become signatories to the RIBA Inclusion Charter.

## Further Information

The National Archives – Equality Act 2010  
<http://www.legislation.gov.uk/ukpga/2010/15/contents>

Equality & Human Rights Commission - What is the Equality Act?  
<https://www.equalityhumanrights.com/en/equality-act-2010/what-equality-act>

## ANNEX - types of discrimination

There are various types of discrimination prohibited by this policy.

### Types of Discrimination – New Definitions

This document is a useful guide and highlights the definitions as laid out in the new Equality Act 2010 and should be read in conjunction with any Gaunt Francis' existing policies and procedures that refer to discrimination, harassment and victimisation.

All relevant policies and procedures will be updated in due course to reflect the amended definitions.

**Protected characteristics** are the grounds upon which discrimination is unlawful. The protected characteristics under the Equality Act 2010 are: Age, disability, gender reassignment, marriage, civil partnership, pregnancy, maternity, race, religion or belief, sex and sexual orientation

**Direct Discrimination** occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see 'perceptive discrimination' below) or because they associate with someone who has a protected characteristic (see 'associative discrimination' below).

**Associative Discrimination** already applies to race, religion or belief and sexual orientation. This is now extended to cover age, disability, gender reassignment and sex. It means direct discrimination against someone because they associate with another person with a protected characteristic.

**Perceptive Discrimination** already applies to age, race, religion or belief and sexual orientation. This is now extended to cover disability, gender reassignment and sex. It means direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person doesn't actually possess that characteristic.

**Indirect Discrimination** already applies to age, race, religion or belief, sex, sexual orientation and marriage and civil partnership. This is now extended to cover disability and gender reassignment.

**Indirect Discrimination** can occur when Gaunt Francis has a condition, rule, policy or even a practice in the company, that applies to everyone but particularly disadvantages people who share a protected characteristic.

**Harassment** is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Harassment applies to all protected characteristics except for pregnancy, maternity, marriage and civil partnership. Employees will be able to complain of behaviour they find offensive – even if it is not directed at them. Employees do not need to possess the relevant characteristic themselves and are also protected from harassment because of perception and association.

**Third Party Harassment** occurs already applies to sex and is now extended to cover age, disability, gender reassignment, race, religion or belief and sexual orientation. The Equality Act makes Gaunt Francis potentially liable for harassment of employees by people (third parties) who are not GFA employees, such as customers, clients and visitors. Gaunt Francis will only be liable when harassment has occurred on at least two previous occasions, they are aware it has taken place, and have not taken reasonable steps to prevent it from happening again.

**Victimisation** occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act, or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

**Disability** is when a person has a physical or mental impairment with a long-term adverse effect on their ability to carry out day-to-day activities, which would include things like using a telephone, reading a book or using public transport.

The Act includes a new protection from discrimination arising from disability. A disabled person should not be treated unfavourably because of something connected with their disability (e.g. spelling mistakes due to dyslexia). This is unlawful where Gaunt Francis or other persons acting on behalf of Gaunt Francis knows, or could reasonably be expected to know that the person has a disability. This type of discrimination is only justifiable if Gaunt Francis can show that it is a proportionate means of achieving a legit