

APPENDIX U – DIVERSITY & INCLUSION POLICY

OUR CORE PRINCIPLES:

- Colleagues are trusted and respected to work responsibly in the best interests of customers and Skipton International (Skipton).
- Colleagues are empowered to make their work lives meaningful, fulfilling, and productive to stay happy and healthy.
- Fairness and inclusivity guides everything we do.
- We will engender an atmosphere of mutual respect.
- We're open-minded and forward thinking – we listen, experiment, learn, adapt and change.
- Everyone's trusted and expected to use the principles to guide their decisions, behaviours, and actions and to apply our policies fairly (which won't always mean equally).

PURPOSE:

This policy outlines our commitment to championing equality, diversity and inclusion among our colleagues and customers, and making clear there's no place for discrimination here.

Scope:

Our Diversity and Inclusion principles underpin everything we do at Skipton. This policy helps us embed those principles, outlining what this means from the perspective of Skipton, our colleagues, customers and the public. This policy applies to all Skipton colleagues, all temporary staff, interns, students on work placement and anyone who is subcontracted to undertake specific duties for Skipton.

PRINCIPLES:

- We share and promote the benefits of diversity and inclusion for colleagues and customers in everything we do. This means everyone can be their best, develop their talents and thrive at work.
- We actively create inclusive opportunities and remove unfair barriers. We value individual contribution and diversity of thought so that colleagues feel comfortable being themselves at work.
- Managers foster our diverse and inclusive culture, where all colleagues feel they belong, and through great conversations we understand and balance all of our needs.
- We encourage innovation, diverse viewpoints and constructive challenge which all helps us deliver better organisational outcomes.

DEFINITIONS:

Diversity: the mix of characteristics (protected or otherwise) that an individual or a group have that makes them unique. We have a better working environment when we accept and respect our unique qualities and recognise individual differences.

Inclusion is about engaging the uniqueness, talents, beliefs, backgrounds, abilities and ways of working of all our colleagues. It's also about working together to create a culture where we belong, are valued and respected.

Bullying: behaviour that's offensive, intimidating, malicious or insulting toward someone else. It could also be an abuse or misuse of power which undermines, humiliates, puts down or hurts another person.

Cyber-bullying: bullying behaviour that uses digital means or platforms as a channel.

Harassment is legally defined as unwanted behaviour in relation to one of the protected characteristic categories below that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.

Victimisation is detrimental treatment towards someone who has made or is believed to have made, or has supported a colleague making a complaint covered by the Equality Act. It can cover situations where a complaint hasn't been made yet, but it's anticipated they might do.

Protected characteristics: the UK Equality Act 2010 identified nine characteristics of significant discrimination in employment (and the provision of goods and services). They are Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex and Sexual orientation.

In addition to the above Protected Characteristics pregnancy and maternity and carer status are Protected Grounds in The Prevention of Discrimination (Guernsey) Ordinance, 2022.

Discrimination is against the law.

- Direct discrimination - can occur when a rule or policy disadvantages someone because of their particular protected characteristic.
- Indirect discrimination - can occur where a rule or policy applies to everyone but disadvantages someone with a particular protected characteristic. However, it may not be discrimination if it can be shown to be a proportionate means of achieving a legitimate aim.
- Discrimination by association - is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- Discrimination by perception - is direct discrimination against someone because they think they possess a particular protected characteristic.

Workplace adjustments (sometimes called reasonable adjustments): a change we'll make to remove or reduce a disadvantage related to a colleague's disability when doing their job, or a candidate's disability when applying for a job.

Policy Statement

Our colleague population is truly representative of where we and our customers live and work. Our differences and individuality bring strength to Skipton. We know that simply having a diverse workforce is not enough. We want to nurture our inclusive culture, so everyone can thrive, contribute their best work and develop to their full potential.

Section 1: Skipton commitments

- We promote equality, diversity and inclusion in the workplace and in the way we provide our services.
- We create a working environment free of bullying, harassment, victimisation and discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all colleagues are recognised and valued.
- We train leaders and colleagues about their rights and responsibilities under this policy.
- We never tolerate bullying, harassment, victimisation or discrimination in any form and always take complaints seriously. And whether the complaints about a colleague, customer, supplier, visitor, or the public, if something happens while you're working here, we'll investigate and do our best to resolve it. (This includes anything that happens outside of work but still to do with your role, such as at a work-related social event or a training course.)
- We always make decisions on merit and through fair processes (apart from in any necessary and limited exemptions and exceptions which are allowed under legislation).
- **Here's the serious bit**, we'll deal with any acts of bullying or harassment as misconduct under our formal grievance and/or disciplinary processes, and we'll take the appropriate action. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- **And an even more serious bit**; harassment can also be a criminal matter. If we uncover any evidence of harassment during an investigation, we may be required to report it to the police.
- We keep our employment practices and procedures under review and monitor the make-up of our workforce to make sure our commitments are being followed through in practice.

An example of our commitments in practice:

Celia works in our Customer Services team and has spoken to her Manager about some recent behaviour by a customer. On a couple of occasions during the past three months, he's refused to be served by Celia and her colleagues overheard him using offensive and degrading language referring to her race and gender.

Celia understandably feels upset by this, and recently took some time off due to stress. The Manager takes Celia's concerns seriously and investigates the situation sensitively and thoroughly, speaking to everyone who's interacted with the customer.

The Manager checks our policy and decides the best course of action is to speak with the customer and explain our commitment to creating a workplace free of harassment. Celia is advised to raise any concerns immediately in the future, so they are dealt with straight away. The examples shared from the investigation are used to demonstrate what is unacceptable to Skipton and the customer is very apologetic. He's advised that any repeats of this behaviour may lead to us closing his accounts. The Manager reminds the team to flag any future concerns quickly and to feel comfortable to call out behaviour that's not in line with our strong values.

Some key things to remember about our commitments:

Discrimination is unfair and so it's right that we pay particular attention to;

- How we reward people fairly through our pay and benefits.
- How we design our terms and conditions of employment.
- How we deal with grievances and discipline.
- The circumstances that might lead to dismissal.
- Which groups may be selected for redundancy.
- Requests for flexible working.
- Selection for employment, promotion, training or other developmental opportunities.

Section 2: Your Responsibilities

We all have responsibility to behave in a way that is respectful of others and to understand that our views and opinions may not always be the same as our colleagues.

Here's some other things you can do to make our workplace more inclusive:

- Try to understand other peoples' points of view and help them understand yours.
- If you see inappropriate behaviour, call it out or report it.
- If you challenge others, do it in a respectful way.
- Be aware of different cultures and customs and respect the benefits that diversity can bring.
- Respect the confidentiality of colleagues and customers.
- Deal with customers, colleagues and suppliers in an ethical and lawful way and with respect at all times.
- Take responsibility for your own actions.
- Look for solutions to problems and try to resolve issues constructively.
- Keep up to date with diversity and inclusion. Staying informed is a great way to develop better awareness and respect for difference. Skipton will provide training as required.

An example of our commitments in practice:

Jayne works in a sales team. The team works to stretching targets and when they're achieved, their leader rewards them with a bottle of wine or buys them bacon sandwiches.

Jayne's noticed that Simon, who's fairly new, isn't getting involved in the competitiveness around targets. They take their breaks together, so she decides to check in with him, to make sure everything is going well. He explains that for religious and health reasons, he doesn't drink alcohol or eat meat, so the incentives are somewhat lost on him. Jayne asks if their leader is aware, and while Simon doesn't think so, he really doesn't want a fuss being made.

Jayne understands this incentive practice, while coming from a good place doesn't feel inclusive for all colleagues. She talks to her leader to share her concerns about their incentive scheme (without mentioning Simon's situation) and offers to design something new.

Some key things to remember about your responsibilities:-

Your responsibilities under this policy don't stop at the office door or the end of the working day. If you put potentially offensive or inappropriate comments or images about or directed at colleagues or customers on social media sites, we'll take this very seriously. We'll investigate it in line with the Disciplinary Policy. There's more information on what's acceptable in the Social Media policy.

This isn't an exhaustive list, but we think the following behaviours are unacceptable in our workplaces. We hope you agree!

- Threatening or using physical violence.
- Using insulting, humiliating or offensive language, both spoken and in writing, including online.
- Sending, circulating or displaying offensive words or images – including on posters, graffiti and tattoos.
- Abusing a position of power.
- Making sarcastic or snide remarks, inappropriate jokes or banter (sometimes these are referred to as micro-aggressions).
- Spreading rumours about someone.
- Excluding someone.
- Making unwelcome sexual advances, suggestive behaviour or comments towards someone.
- Making unnecessary or unwanted physical contact with someone.

Section 3: Your rights and how to address concerns

It's a given that we all have a right to work in a fair and inclusive environment free from bullying, harassment, victimisation and discrimination. If you feel you're being bullied, harassed, victimised or discriminated against, it can feel very isolating, emotional and distressing, but you're not on your own - there's help available.

Getting advice

If you feel that you're being bullied or harassed, it may be difficult to decide how you want to deal with it. If it would help to talk this through with someone, our colleagues in HR can be contacted for advice: hr@skiptoninternational.com. You can also call our Employee Assistance Programme on 0800 015 5630.

Resolving things informally

It's always better to try to sort things out informally if possible. Explaining to the person responsible, how their actions make you feel and asking them to stop may get things resolved. They might not realise the impact of their words or actions or meant to offend you.

But if you don't feel able to speak to the person, talk to your manager about the problems you're having. If it's appropriate, your manager may speak to them confidentially to say that their behaviour is unacceptable and needs to change.

If you don't feel you can speak to your manager, or your complaint is about them, you can speak informally to your manager's manager. There may be other people you feel comfortable speaking to, such as another manager, someone in the HR function - or you can make a formal complaint. There's more information on how to resolve issues informally in our Grievance Policy.

An example of our commitments in practice:

Tahira has worked as an administrator in the banking team for just over 3 months. She already knows a few of her colleagues, as they attended school together. She had a difficult relationship with one colleague, Sophie, at school and is feeling uncomfortable that the same behaviours are starting at work.

She notices Sophie taking other colleagues to one side and whispering while looking at Tahira. It could be nothing, but she feels that the warm welcome she had when she started in her role, is changing and she's been getting fewer informal messages from her colleagues. She's unsure how to deal with it, but as she trusts her manager, she speaks with him first. While she feels a bit nervous, through some brilliant coaching from her manager, Tahira feels the right first step is to book time with Sophie to talk about her behaviour and the impact it's having.

During their conversation, they reflect on their experience at school and Sophie shares that she felt jealous of Tahira but now understands how her behaviour made Tahira feel. The pair talk some more and agree to draw a line under the past. Sophie apologises and promises she'll change her behaviour. Tahira feels proud of the way they've dealt with it and thanks her manager for his support.

Making a formal complaint

If you don't feel able to sort things out informally, you can make a formal complaint. To do this, you'll need to raise a grievance in writing and send it to the HR Manager. See the Grievance Policy for more information.

We know it's not an easy thing to do to speak up about these things, so we'll investigate this as quickly as possible. If we find evidence, we'll take appropriate action against those involved.

Some key things to remember about your rights: -

Support and protection for colleagues

If you raise a concern in good faith, or you've witnessed bullying and harassment at work, we'll give you support and you'll be protected from negative treatment because of it. Also, if you've been accused of bullying and harassment and we find this is untrue, you're protected from negative treatment in your employment because of it. We'll also give you support if you need it.

Performance management

Bullying isn't the same as managing someone's performance. If your manager's giving you work to do or managing your performance using an informal or formal process - and they're doing that in a professional and supportive way - this won't on its own be considered bullying.

But if you do feel that your manager's behaviour towards you is unacceptable, talk to them about it. If you feel like you can't do this, there are other ways you can raise your concerns – see 'Making a formal complaint' above.

Section 4: The impact

Sometimes, this stuff needs spelling out. Treating each other poorly or behaving in a way that's not in keeping with this policy affects people and our business. Here's some possible impacts but there'll be others too.

Poor behaviour could;

- Make someone feel anxious and humiliated, angry and frustrated, or as if they are unable to cope.
- Have a deteriorating effect on mental health and wellbeing including anxiety, stress and depression.
- Lead to some people exhibiting unacceptable behaviour themselves.
- Lead to people becoming distressed and demotivated to come into work.
- Cause stress, loss of self-confidence and low self-esteem leading to illness, absence from their role, and even resignation.

- Impact on job performance and as a consequence, relations in the workplace suffer.

Section 5: If you need further support

Remember we have an Employee Assistance Programme who can provide colleagues with support. And our HR team are on hand to help.

Communication: This policy is available to all colleagues through the Colleague Handbook and via Skipton's website.

Implementation: All relevant colleague and manager development programmes, informal learning "bite-size" events, team meetings, colleague check-ins.

Evaluation:

- Colleague population diversity indicators
- Grievance and disciplinary cases
- Performance management cases

Section 6: And here's the housekeeping bit;

Related Policies

- Dignity at Work
- Grievance Policy
- Disciplinary Policy
- Equal Opportunities
- Whistleblowing
- Social Media
- Vulnerable Customer
- Flexible Working
- Redundancy

Relevant Legislation

- Guernsey: Sex Discrimination (Employment) (Guernsey) Ordinance 2005 and The Prevention of Discrimination (Guernsey) Ordinance, 2022.
- Jersey: The Discrimination (Jersey) Law 2013