

<b>Millbank Holdings Group Ltd</b> (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Equality, Diversity and Inclusion Policy</h2>	POL013/01/0419
		Last Reviewed: 11/2022
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		Owner: David Hopley

## 1 Purpose

Millbank Holdings Limited and its subsidiaries will promote the benefits of equality, diversity and inclusion in all our business activities. The purpose of this policy is to ensure that all employees 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 on the basis of 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 Millbank.

## 2 Scope

This policy applies to all employees regardless of service, contract or position.

## 3 Responsibility

For our policy to be successful, it is essential that everyone is committed to, and involved in its delivery. Our goal is to provide a work environment free from discrimination, harassment and prejudice. We aim to embed this in all our policies, procedures, day-to-day practices and all relationships.

By accepting employment either temporary or permanent with us you are agreeing to take personal responsibility to comply with this policy and to treat colleagues, candidates and clients with dignity and respect at all times. This includes maintaining acceptable standards of personal behaviour towards colleagues, suppliers, visitors and clients alike.

Senior Managers have particular responsibility to communicate and support the Equality, Diversity and Inclusion Policy and ensure through regular review that the policy is implemented and revised where necessary.

## 4 Our commitment

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

- comply with all legislative requirements and codes of practice covering the protected characteristics;
- ensure that we comply with this policy and do not discriminate intentionally or unintentionally against any group or individual;
- become an employer of choice by promoting and developing policies that support a work-life balance, equal pay and ensuring that we maximise employment opportunities for all;
- encourage and promote diversity in our workforce reflecting where practicable the diversity of the working population and to monitor applications and appointments in this respect;
- ensure employees are aware of their personal responsibility to apply this policy;
- promote a culture of fairness and respect in all employment policies, procedures and practices;
- build a workforce that represents the diverse communities we serve, removing barriers to employment for individuals with protected characteristics;
- we will attract, select and recruit the people most suited to specific roles, based on their ability to do the job, irrespective of their background;
- ensure pay structures reward all employees fairly;
- recognise that employees have the right to work in a supportive, safe and environment free from harassment;

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- ensure that we have in place procedures for equal pay;
- create an environment in which individual differences and the contributions of all our employees are recognised and valued;
- ensure employees are aware of their personal responsibility to apply this policy.

It is our aim to ensure a diverse workforce that is reflective of wider society and local community, and to provide and maintain a working environment free from harassment, intimidation and bullying.

Our recruitment practices will ensure a diverse employee and candidate base as possible and we will support our clients to meet their own diversity targets.

We will not discriminate on grounds of gender, gender reassignment, marital status (including civil partnerships), race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age. We oppose all forms of unlawful and unfair discrimination.

We shall not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers.

We will not accept instructions from clients that indicate an intention to discriminate unlawfully.

## 5 Dignity at Work

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe you may have been subject to harassment you are encouraged to raise the matter through our Anti-Bullying and Harassment Policy and Procedure. If you are uncertain which policy applies or you need advice on how to proceed you should speak to HR.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedures. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will however be dealt with under the Disciplinary Procedure.

## 6 Communication of Policy

New employees will be briefed on the content of this Policy during the induction process, it will also be referred to in our Employee Handbook.

## 7 Monitoring

We will monitor, via an Equal Opportunities Form, the make-up of the workforce regarding information such as age, gender, 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 this policy.

Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plans, are working in practice, reviewing them annually, and considering and taking action to address any issues.

## 8 Breach of This Policy

Every employee is required to assist us to meet our commitment to provide equal opportunities in employment and avoid unlawful discrimination. Employees can be held personally liable as well as, or instead of, Millbank for any act of unlawful discrimination.

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Any employee who is found to have committed an act of discrimination or harassment will be the subject of disciplinary action up to and including summary dismissal.

## 9 Related Documents

### 9.1 Internal Documents

- HRPOL001 - Anti-Bullying and Harassment Policy
- HRSOP009 - Anti-Bullying and Harassment Procedure
- HRSOP008 - Grievance Procedure

### 9.2 External Documents

- Equality Act 2010

## 10 Policy Review

This policy will be reviewed annually, when circumstances indicate a change is needed or when legislation is introduced that necessitates change.

Signed by:

*David Hopley*

Title: Managing Director

Date: November 2022

**Any personal data collected in line with this policy will be stored and used in line with our Data Protection Policy, Retention Policy and Privacy Notice.**