
EQUALITY, DIVERSITY & INCLUSION POLICY 2023

REGIN GROUP LTD

EQUALITY, DIVERSITY & INCLUSION POLICY CONTENTS

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EQUALITY, DIVERSITY & INCLUSION POLICY

1. INTRODUCTION – REGIN GROUP LTD

Regin Group Ltd Logistics Management Services is An Employer in the UK that has a responsibility to promote an Equality, Diversity & Inclusion Culture and Environment within our business. As a Business, Regin Group Ltd we do this by recognising that our success depends on our Recruitment and Retention of people and encouraging them to reach their full potential and achieve their ambitions as an Inclusive Employer.

Regin Group Ltd believe Employee Diversity is an asset to our business. People of different age groups, from different Backgrounds & Communities (BAME), Genders and Cultures with a range of different experiences and capabilities, help us to understand and serve our Clients and Customers and reach the Regin Group Ltd Business Objectives.

Regin Group Ltd recognise the need for all our Employees to possess the levels of skill and knowledge appropriate to the roles they perform in delivering the quality of service that all our Clients and Customers expect. This approach and mutual respect will create a Culture and Environment of co-operation and achievement that underpins the high quality of the Logistics Services and Logistics Management we offer.

Regin Group Ltd will strive for a truly Inclusive Business where our people can and will bring their whole selves to work. The documents referenced in this Policy are referenced as below:

- Equality Act (Specific Duties)2010.
- Human Rights Act 1998.
- Data Protection Act 1998.
- Sex Discrimination Act 1975.
- Race Relations Act 1976.
- Disability Discrimination Act 1995.
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2. STATEMENT OF INTENT

Regin Group Ltd do not Discriminate on the basis of “Protected Characteristics”. Protected Characteristics include Gender, Disability, Race, Colour, Nationality, Ethnic or National Origin, Sexual Orientation, Gender Reassignment, Religion or Belief, Marital Status or Civil Partner Status, Age, Pregnancy & Maternity.

This Equality, Diversity & Inclusion Policy applies also applies equally to the treatment of our Clients, Customers, Suppliers and Visitors by all our Employees and Workers and the treatment of all our Employees and Workers by these third parties.

Regin Group Ltd values the Diverse nature of its people and seeks to manage any Diversity issues which arise in a fair, transparent and sensitive manner.

Everyone at Regin Group Ltd has a duty to act in accordance with our Equality, Diversity & Inclusion Policy and to treat colleagues with Dignity at all times. Regin Group Ltd under no circumstances will not accept or tolerate any Discriminatory Practices or Behaviour by any of its people.

Regin Group Ltd promotes Equality, Diversity and Inclusion by treating everyone fairly and creating an inclusive Culture for all our Employees and Workers coupled with ensuring equal access to opportunities to enable all Employees and Workers to fully participate in this learning process and enabling all Employees and Workers to develop to their full potential. Our approach is based on three key Principles:

- **EQUALITY** - Regin Group Ltd promote Equality of Opportunity by seeking to remove Barriers, Eliminating Discrimination and ensuring Equal Opportunity and Access for all Groups of People.
- **DIVERSITY** - Regin Group Ltd accept each person as an Individual. Our success is built on our ability to embrace Diversity and we believe that everyone should feel valued for their contributions to our Business. By working together, we will deliver the best possible levels of service for all our Employees, Workers and Clients.
- **INCLUSION** - Regin Group Ltd creates a Working Culture where differences are not merely accepted but Valued and where everyone has the opportunity to Develop in a way that is consistent with and adheres to the - Regin Group Ltd Values of Impartiality, Honesty, Integrity and Objectivity. - Regin Group Ltd aim is to be an Organisation where people feel Involved, Respected and Connected to our success.

3. EQUALITY, INCLUSION & DIVERSITY – CORE POLICY

In accordance with its Statement of Intent, Regin Group Ltd is fully committed to the following:

- Regin Group Ltd recognises that its business success relies on developing the potential and ability of all its Employees to the full. In order for this to occur, all our Employees will be given the Equality of Opportunity and encouragement to progress within our organisation.
- Everyone at Regin Group Ltd is asked to take Responsibility for their own personal involvement in the practical application of the Regin Group Ltd Equality, Diversity & Inclusion Policy.

In order for Regin Group Ltd to facilitate this Equality, Diversity & Inclusion Core Policy:

- Copies of the Regin Group Ltd Equality, Diversity & Inclusion Policy will be made available throughout the organisation via the Regin Group Ltd Intranet and organisation notice boards. Everyone is responsible for the success of the Regin Group Ltd Equality, Diversity & Inclusion Policy and must ensure that they familiarise themselves with the Equality, Diversity & Inclusion Policy and act at all times in accordance with its aims and objectives.
- Those Employees who work at Senior Management level have a specific responsibility to set the expected and appropriate standards of behaviour, to lead by example and to ensure that those they manage adhere to the Equality, Diversity & Inclusion Policy. Management Development programmes will raise awareness of the Equality, Diversity & Inclusion Policy as well as providing support to Managers in promoting Equality, Diversity & Inclusion to all our Employees and Workers.
- All Legal obligations under the Equality Act 2010 and all other relevant legislation will be recognised and acknowledged.
- This Equality, Diversity & Inclusion Policy will be reviewed Annually or as necessary.
- Grievance procedures are provided for any Regin Group Ltd Worker or Employee who believes they have been treated Unfairly or subjected to Discrimination, Harassment, Bullying or Victimisation. Issues can be raised through the Regin Group Ltd Grievance procedure in our Regin Group Ltd – Employee Handbook.
- The Disciplinary procedures in our Employee Handbook may be used when Employees or Workers fail to observe their own responsibilities for the Equality, Diversity & Inclusion Policy.
- Discrimination may be considered as an act of Gross Misconduct which can lead to summary dismissal or summary termination of Regin Group Ltd Contract / Engagement.

- The Regin Group Ltd Managing Director with support from the Business Office / HR Manager will assume the main responsibility for the Implementation and Revision of the Regin Group Ltd – Equality, Diversity & Inclusion Policy.

4. TYPES / FORMS OF DISCRIMINATION - PRINCIPLES

In order for Regin Group Ltd to facilitate this Equality, Diversity & Inclusion Core Policy all Senior Management, Employees and Workers must understand the Principles of Discrimination – As below:

- Discrimination may be Direct or Indirect and it may occur Intentionally or Unintentionally.
- Direct Discrimination occurs where someone is treated less favourably than another person because of a "Protected Characteristic". The Protected Characteristics are set out in our Statement of Intent referred to earlier in the Equality, Diversity & Inclusion Policy. Direct Discrimination includes discrimination by Association and discrimination by Perception. Associative Discrimination occurs when someone is treated less favourably than another person because of association with another person who possesses a Protected Characteristic. Discrimination by Perception occurs when someone is treated less favourably because others think they possess a Protected Characteristic even if they do not actually possess that characteristic.
- Indirect Discrimination occurs where someone is subjected to an Unjustified Provision, Criterion or Practice which puts them at a particular disadvantage because of Protected Characteristic. Indirect Discrimination can be justified if it is a proportionate means of achieving a legitimate aim.
- It is also Unlawful Discrimination to treat a Disabled Person unfavourably because of something arising in consequence of their Disability. This type of Discrimination can be justified if you can show that the treatment is a proportionate means of achieving a legitimate aim. Disability Discrimination also includes a failure to comply with a duty to make reasonable adjustments.
- Discrimination also includes Victimisation which occurs when a person is subjected to a Detriment because they have done a Protected Act or it is believed the person has done, or may do, a Protected Act.
- A Protected Act is, for example, when a person brings proceedings under the Equality Act 2010 or, makes an Allegation that someone has contravened the Equality Act 2010. Giving False Evidence or Information, or making a False Allegation is not a protected act if the Evidence or Information is given, or the Allegation is made, Maliciously.
- Discrimination also includes Harassment which occurs when a person is subjected to Unwanted Conduct to a relevant "Protected Characteristic" which has the purpose or effect of Violating that persons Dignity or creating an Intimidating, Hostile, Degrading, Humiliating or an Offensive Environment.

5. SCOPE OF THE EQUALITY, INCLUSION & DIVERSITY POLICY

The Equality, Diversity & Inclusion Policy applies to all aspects of Regin Group Ltd relationships with Employees and Workers and to relations between Employees and Workers at all levels. This includes Job Advertisements, Recruitment and Selection, Training and Development, Opportunities for Promotion, Conditions of Service, Pay and Benefits, Conduct at Work, Disciplinary & Grievance Procedures, Termination and Post Termination of Employment.

6. EQUALITY & DIVERSITY IN RECRUITMENT, SELECTION, DEVELOPMENT & TRAINING

1) RECRUITMENT OF EMPLOYEES

The intention of Regin Group Ltd is to recruit for any position within our Business in a fair and Non-Discriminatory manner. It is essential that Recruitment and Selection procedures are based on objective criteria related to the needs of the role / job and that such criteria are equally applied at all stages during the process to all internal / external applicants at all levels within the organisation (subject to any reasonable adjustments being made to the selection process). Regin Group Ltd is committed to give Ex-Offenders an Equal Opportunity to enter the Logistics Workplace.

2) RECRUITMENT PROCEDURES

- All advertisements should conform to Regin Group Ltd Standards. Recruitment and Publicity Literature will state that Regin Group Ltd is an Equality, Diversity and Inclusion Employer. If in doubt, contact the Regin Group Ltd Business Office / HR Manager for advice and guidance.
- Each role advertised should be accompanied by a full Job Description and Person Specification.
- Vacancies should be publicised appropriately to as a wide range of suitable candidates as possible. Personal "Word of Mouth" recommendations should not be used as the sole Method of Recruitment.
- Employment Agencies, where their use is applicable or required should be made aware that Regin Group Ltd is an Equality, Diversity and Inclusion Employer. Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular Protected Characteristic from applying.
- All Job applicants are required to complete Regin Group Ltd application process. Equal Opportunity information given at application stage should be stored anonymously on the Regin Group Ltd central database for reporting purposes only. It should not be used to form part of the "Short-Listing Process" under any circumstance. Short-Listing should be done by Merit of Application and by no other means. Disclosure of such Equal Opportunity Information should be optional to candidates.
- Applicants will not be asked about Past or Current Pregnancy or Childbirth of future intentions related to Pregnancy or Childbirth.
- Candidates will not be asked Health related questions before a Job/ Role offer is made except where the question is necessary to decide whether any reasonable adjustments should be made to the selection process, to establish whether a candidate will be able to carry out a function that is intrinsic to the Job / Role or to monitor Diversity amongst people applying for Jobs / Roles.
- When a candidate with a Disability is invited to attend for interview, Regin Group Ltd shall make any reasonable adjustments necessary to facilitate their attendance. Candidates should advise Regin Construction Services Ltd where such adjustments are necessary.
- Regin Group Ltd takes appropriate and reasonable steps to accommodate the requirements of candidates' Religions, Cultures and Domestic Responsibilities.
- Regin Group Ltd Senior Management may, at their discretion use Professional Search Consultants if the appointment is of a Senior or Specialist Nature, and where obtaining suitably qualified candidates by traditional recruitment methods is regarded as unlikely to secure the most talented candidates.
- Reasons for rejection of all candidates should be recorded and retained in accordance with timescales set out in Regin Group Ltd Document and Information Management Policy.
- Any Psychometric Testing or Examinations used as part of the recruitment process will be carried out by a Qualified Person / Personnel only.

- Regin Group Ltd is required by law to ensure that all Employees are “Entitled to Work” in the United Kingdom. Assumptions about Immigration Status will not be based on appearance or apparent nationality. All prospective Employees / Workers regardless of nationality must be able to produce Original Documentation (such as a Passport) before employment commences, to satisfy current Immigration Legislation. The list of acceptable documents is available from the Regin Group Ltd Business Office / HR Manager for advice and guidance and reference can be made to the Regin Group Ltd “Right to Work Guidance” Policy held on the Regin Group Ltd Intranet.

3) SELECTION GUIDELINES

The following Selection Guidelines should be observed when short-listing and interviewing candidates:

- Short-Listing criteria should be Objective, based on those Skills, Expertise and Knowledge necessary to carry out the Job / Role. The recruitment for formal Academic or Professional Qualifications may be waived if candidates clearly demonstrate their suitability by other means. Willingness to undergo training should be considered and taken into account.
- Similarly, it should not be assumed that Overseas Degrees or Diplomas are of a lower standard than their equivalents in the United Kingdom. If in doubt, there are a number of agencies such as UCAS who are able to determine the level of Equivalence of overseas qualifications.
- Interview Questions should be relevant to the Job / Role. Care at all times should be taken to ensure that no assumptions are made, or leading questions asked relating to Personal Circumstances and Future Plans. If Job / Role requirements are likely to affect a candidates Personal Life (e.g. Unsociable Hours or Travel Arrangements) then the same questions regarding these should be asked of and to all applicants.
- Regin Group Ltd Interview and Report Forms should be completed and retained in accordance with timescales set out in the Document and Information Management Policy.
- Skills, Knowledge, Ability and Competence will be the main criteria for Selection and Promotion.
- Any Regin Group Ltd Interviewer should have relevant and appropriate Training to ensure that they are familiar with all of these requirements.

4) EMPLOYEE DEVELOPMENT & TRAINING

Regin Group Ltd wishes to ensure that no Employee or Worker is disadvantaged in the provision of appropriate Training and Development opportunities. The following procedures should be followed and understood:

- All Regin Group Ltd Employees and Workers should participate in the Regin Construction Services Ltd Annual Performance Review process – Regin LPDP Annual Logistics Performance Development Process which will assess their current level of Job / Role Performance as well as their Personal Training and Career Development needs.
- All Regin Group Ltd Employees and Workers will have access to and be encouraged to take full advantage of suitable Training and Development opportunities.
- Decisions relating to Career Development should be based on objective criteria which are fairly applied. The ability to meet the requirements of the position successfully should be the main criterion for promotion.

Training is provided by Regin Group Ltd in order to increase the Knowledge and Skills of Employees / Workers and all Training Course Materials and Content will reflect Regin Group Ltd position as an Equality, Diversity and Inclusion Employer.

7. DISABILITY

If someone is Disabled, or becomes Disabled in the course of their Employment Duties / Role or Engagement they are encouraged to inform Regin Group Ltd about their condition as soon as practicably possible in order that they can be supported by Regin Group Ltd and reasonable adjustments can be made for them if required.

8. BULLYING & HARASSMENT

Regin Group Ltd will endeavour to embed a Culture which eliminates Bullying and Harassment in the Business and Workplace. All Regin Group Ltd Senior Management, Workers and Employees should treat others with the Respect and Dignity that they would expect for themselves. Bullying and Harassment of others in any form will not be tolerated by Regin Group Ltd and will be dealt with under Regin Group Ltd Disciplinary Procedures.

Bullying or Harassment may be considered as Acts of Gross Misconduct which can lead to Summary Dismissal or Summary Termination of Regin Group Ltd Contract / Engagement.

All Regin Group Ltd Employees and Workers should read and adopt the procedures detailed under the Section “How to make a Complaint” if they consider acts of Bullying or Harassment have taken place.

9. VICTIMISATION

Refer also to the Section 4, in the Regin Group Ltd – Equality, Diversity & Inclusion Policy of Types / Forms of Discrimination – Principles.

Victimisation occurs when an individual is subjected to Detriment because they have brought proceedings under the Equality Act 2010; or given Evidence or Information in connection with proceedings under the Equality Act 2010; or done any other thing for the purpose of or in connection with the Equality Act 2010; or raised a Grievance / Allegation about Discriminatory Behaviour. It is unlawful to Victimise individuals. Regin Group Ltd Employees or Workers found to have committed Acts of Victimisation or Inducing others to Discriminate in connection with their Employment with Regin Group Ltd, or intentionally failing to comply with the Regin Group Ltd – Equality, Diversity & Inclusion Policy will be subjected to Regin Group Ltd Disciplinary Procedures. Such conduct may be considered as Acts of Gross Misconduct which can lead to Summary Dismissal or Summary Termination of Regin Group Ltd Contract / Engagement.

10. HUMAN RIGHTS

Regin Group Ltd Business activities are pursued with Respect for Human Rights. It is not acceptable to Regin Group Ltd to abuse the Human Rights of either Individuals or Groups of Individuals or fail to operate in a manner consistent with the Principles of the Human Rights Act 1998.

Regin Group Ltd will not participate in, contribute to or obtain information from any “Blacklist” or similar service which undermines these principles and as part of this obligation, Regin Group Ltd will ensure that compliance with the Regin Group Ltd – Ethics Policy, as well as the Regin Construction Services Ltd – Equality, Diversity & Inclusion Policy, will form part of the selection process for appointing Subcontractors and other party's / members of the Regin Group Ltd Supply Chain.

11. FIXED TERM EMPLOYEES & AGENCY WORKERS

Regin Group Ltd monitors the use of “Fixed Term” Employees & Agency Workers and their Conditions of Service to ensure that they are being offered appropriate access to Benefits, Training, Promotion and Permanent Employment Opportunities.

12. PART TIME EMPLOYEES WORKERS

Regin Group Ltd monitors the Conditions of Service of Part Time Employees and Workers and their progression to ensure that they are being offered appropriate access to Benefits, Training, Promotion and Opportunities.

13. FLEXIBLE WORK

Regin Group Ltd Senior Management will ensure that requests to alter Working Hours / Work Flexibly are dealt with appropriately under the Regin Group Ltd – Flexible Working Policy.

14. MANAGEMENT RESPONSIBILITIES

Full Compliance with the Regin Group Ltd – Equality, Diversity & Inclusion Policy depends on the full commitment of everyone within the organisation including all Directors and Senior Management, Managers and Supervisors who will take a lead in implementing the Regin Group Ltd – Equality, Diversity & Inclusion Policy and keeping the workplace free of Discrimination, including Harassment, Victimisation and Bullying. Prompt and immediate action will be taken by Regin Group Ltd to resolve any complaints and prevent any further recurrence.

15. INDIVIDUAL RESPONSIBILITIES

Regin Group Ltd encourages all Employees and Workers to take full responsibility for their personal involvement in the practical application of the Regin Group Ltd – Equality, Diversity & Inclusion Policy, and for creating a work environment which eliminates all forms of Discrimination, including Harassment, Victimisation and Bullying.

Any Regin Group Ltd Employee or Worker who is found to have breached the Regin Group Ltd – Equality, Diversity & Inclusion Policy in their working relations with others will be subject to the Regin Construction Services Ltd – Disciplinary Procedures detailed in the Regin Group Ltd Employee Handbook, up to and including Summary Dismissal.

Anyone else from Regin Group Ltd who is found to have breached the Regin Group Ltd – Equality, Diversity & Inclusion Policy in their working relations with others will be subject to action up to and including Summary Termination of Regin Group Ltd Contract / Engagement.

16. MONITORING

As part of Regin Group Ltd commitment to Equality, Diversity and Inclusion, monitoring will be carried out at the Recruitment Stage and at subsequent regular intervals during the Regin Group Ltd Employee and Workers career with us. Regin Group Ltd application process includes sections which enable all Applicants, Employees and Workers to declare (only if they wish to do so) their Ethnic Origin and Disability they may have. Information from monitoring will assist with a system of Management reporting which will assess the success of the Regin Group Ltd – Equality, Diversity & Inclusion Policy. In particular, Regin Group Ltd will report on key measures which include Gender Composition of the Workforce, Age, Race, Ethnic Origin, Sexual Orientation, Disability, Religion or Belief.

As part of Regin Group Ltd Management Information provided by Job Applicants, Employees and Workers for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

17. HOW TO MAKE A COMPLAINT

If anyone of Regin Group Ltd feels that they have a Grievance or Complaint under the Regin Group Ltd – Equality, Diversity & Inclusion Policy they may, in the first instance and if they wish and feel comfortable to do so, make the issue known to the person responsible for the behaviour and request that it immediately should cease. Individuals may also seek as an alternative, seek the Guidance and Direction of any Regin Group Ltd Director, Senior Manager or member of HR in attempting to resolve matters in an informal manner.

Individuals should make any concerns known to any Regin Group Ltd Director, Senior Manager or member of HR immediately or as soon as practicably possible.

Where it does not prove possible to reconcile issues informally, or if an individual does not want a matter dealt with informally, Regin Group Ltd Employees or Workers should make a Complaint using the Regin Group Ltd Grievance Procedure and Complaints by anyone else will also be investigated by Regin Group Ltd.

The Regin Group Ltd Grievance Procedure is set out in the Regin Group Ltd – Employee Handbook which is provided to all Employees on commencement of their Employment with Regin Group Ltd and is also displayed on business notice boards and is available to download from the Regin Group Ltd Intranet. Additional copies can be obtained from the Regin Group Ltd Business Office / HR Manager.

Grievances or Complaints linked to Equality, Diversity and Inclusion will be dealt with in the strictest confidence and will not prejudice the Regin Group Ltd Employee or Workers employment status or future career prospects, or the Employees, Workers or Contractor's current status or future prospects with Regin Construction Services Ltd. Vexatious Allegations, False Allegations made Maliciously or a Breach of the Regin Group Ltd – Equality, Diversity & Inclusion Policy may however, be considered a Disciplinary Offence. Vexatious Allegations or False Allegations made Maliciously may result in Disciplinary Action up to and including Summary Dismissal or Summary Termination of Regin Group Ltd Contract / Engagement.

Allegations regarding potential Breaches of the Regin Group Ltd – Equality, Diversity & Inclusion Policy will be treated in Confidence and fully investigated.

18.EMPLOYEE ASSISTANCE PROGRAMME

If any Employee or Worker of Regin Group Ltd feels they have been Victimised, Harassed, Bullied or Discriminated against they may also wish to speak to the Regin Group Ltd appointed "Lifestyle" Senior Manager in the strictest confidence for information and support. This service is open to all Regin Group Ltd Employees and Workers and no information from any of these calls will be fed back to Regin Construction Services Ltd by the Regin Group Ltd appointed "Lifestyle" Senior Manager unless there is deemed a serious risk of harm to that Employee or Worker, or any other person.

To use this service, Regin Group Ltd Employees or Workers should contact 07860 801853, to speak to the Regin Group Ltd appointed "Lifestyle" Senior Manager. Further up to date information on this service is available on the Regin Group Ltd Intranet.

The Regin Group Ltd Equality, Diversity & Inclusion Policy does not form part of any Employee's Contract of Employment and it may be amended at any time.



David Chinejani
Business Owner
Regin Group Ltd.

January 2023