

## Equality and Diversity Policy

### 1. Our Commitment

Valeo USL Limited (“USL”) is committed to creating an inclusive environment that values diversity, fairness and mutual respect in its employment practices and activities. We appreciate the differences and similarities between people and strive to meet their individual needs in a variety of ways.

Our goals are to:

- recruit people from backgrounds representative of our local communities and our students (referred to below as guests), and provide equal opportunities in employment;
- welcome guests from all backgrounds and cultures and make them feel supported and included by the community in which they live and study;
- provide fair access and treatment to suppliers and partners delivering our services and products; and
- support and develop our relationships with diverse local organisations.

USL actively opposes and is fully committed to the elimination of unlawful and unfair discrimination in its employment and business practices.

All employees are responsible for the promotion and advancement of this policy. Behaviour, actions or words that transgress this policy will not be tolerated and will be dealt with in accordance with USL’s disciplinary policy.

These commitments are underpinned by USL’s core values and strategic goals and are embedded into every aspect of its business.

This policy is not contractual.

### 2. Policy Aims

This policy is intended to assist USL put in into practice the commitments outlined above and to ensure that employees do not commit unlawful acts of discrimination.

### 3. Scope

This policy applies to all employees, contractors, consultants, casual workers and agency staff.

It also applies to all processes relating to employment and training and to any dealings with our guests, clients, suppliers and business partners.

All employees are required to become familiar with and observe the spirit and letter of this policy together with USL’s Equal Opportunities and Dignity at Work Policy.

### 4. The law

USL will comply with the law and will not discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation (“Protected Characteristics”)

It will not discriminate because of any other irrelevant factor and will build a culture that values meritocracy, openness, fairness and transparency.

## 5. Definitions

**Direct discrimination** occurs when a person treats another less favourably than they treat or would treat others because of a protected characteristic.

**Less favourable treatment** occurs if you put someone at a clear disadvantage compared with others; for example, being deprived of a choice or excluded from an opportunity.

**Associative discrimination** occurs where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (subject to some exceptions).

**Perceptive discrimination** is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

**Indirect discrimination** occurs when a provision, criterion or practice is applied universally, but its effect disadvantages people who share a protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination).

**Harassment** is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity which are covered by direct discrimination provisions in the Equality Act 2010) that has the purpose or effect of violating a person's dignity; or is reasonably considered by that person to create an intimidating, hostile, degrading, humiliating or offensive environment.

**Victimisation** occurs where someone is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he/she is suspected of doing so.

**Failure to make reasonable adjustments** is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that disability and no reasonable adjustments were made to enable the disabled person to overcome the disadvantage.

## 6. Promoting equal opportunities and diversity

USL will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training and development, pay and benefits, discipline and selection for redundancy.

USL will not discriminate unlawfully against guests using or seeking to use the services provided by USL.

USL will make decisions relating to guests, clients, suppliers and business partners based on business related criteria only and any irrelevant information will not form part of the process.

## **7. Promoting an inclusive guest environment**

USL will make every effort to meet the needs of its guests regardless of their backgrounds and will foster good relations with them and between them.

## **8. What we will do to achieve this**

- Make equality and diversity the responsibility of everyone working for and partnering USL.
- Set equality and diversity objectives that have the support of the board.
- Develop an inclusive culture with effective communication and codes of behaviour.
- Work towards the elimination of unlawful discrimination, harassment, and victimization based on a protected characteristic, whether actual, perceptible, or associative.
- Ensure our values, policies and day to day activities are consistent with this policy.
- Make our buildings and services accessible to all guests.
- Make it clear that everyone has a personal responsibility to identify and challenge unacceptable behaviour at work and report any form of discrimination, bullying, unfair treatment or harassment.
- Continue to enforce procedures that deal with all forms of discrimination, harassment, bullying and intimidating behaviour.
- Integrate equality and diversity into training and development programmes and incorporate behavioural competencies into assessment and selection processes.
- Establish education programmes for all staff (including programmes that move from awareness to behavioural change).
- Provide additional training for line management to help them comply with this policy and deal effectively with complaints of bullying and harassment.
- Establish effective links with appropriate local community groups for the benefit of our guests.
- Build professional relationships with educational establishments and other organisations to develop a positive external image and to position USL as the partner of choice.
- Regularly audit, review and evaluate progress and address any shortcomings.

## **9. If things go wrong**

Please report any concerns you have to either your line manager, the HR Manager or the Operations Manager who can be contacted at:

p.brook@urbanstudentlife.com

USL will treat complaints sensitively and maintain confidentiality to the maximum extent possible.

## **10. Data protection**

USL processes personal data collected in connection with this policy in accordance with its Data Protection Policy. Information about how data is used and the basis for processing the data is provided in the USL's Team Member and Job Applicant Privacy Notices.

## **11. Review**

USL reserves the right to amend this policy at its discretion.