

POLICY

Equality, Diversity & Inclusion



The NDA is committed to developing, maintaining and supporting a culture of equality, diversity and inclusion in its workforce. This are reinforced by the NDA Values; see the Code of Conduct for full details.

Scope

This policy applies to all workers including colleagues, consultants, temporary workers, agency staff, secondees and other third parties working on behalf of the NDA. It applies to the Board of NDA in the discharge of their duties.

This Policy sets out the NDA's commitment to ensuring that all employee are treated equally, regardless of any 'protected characteristics' which they may possess.

'Protected Characteristics' includes:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

General Principles

The 5 principles of this policy are concise and specific:

- We strive to achieve equality
- We actively encourage diversity across our workforce
- We encourage and embrace an inclusive culture
- Bullying is not acceptable – zero tolerance exists
- Harassment is not acceptable – zero tolerance exists

There should be no discrimination, whether direct or indirect, because of any of the protected characteristics set out above. The types of discrimination that are prohibited are explained below.

Discrimination may occur in the following forms:

Direct discrimination - this is treating someone less favourably because of a protected characteristic. An example of this is paying someone less because of their gender or because they belong to a particular racial group. 'Because of' is very wide and includes less favourable treatment based on a perception of another person, for example that the person is gay, or is disabled, whether or not this perception is correct and even if the perpetrator knows that their perception is, in fact, wrong. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic.

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Indirect discrimination - this is treating people in the same way but in a way which adversely affects those with a protected characteristic. An example of this is telling all employees that they have to work late at night. Although applied to everyone, this policy may adversely affect those employees with childcare responsibilities, and statistically women often bear more of these responsibilities.

Victimisation - this is treating someone less favourably because they have asserted their right not to be discriminated against because of a protected characteristic. An example of this would be an employee claiming that they had been discriminated on the grounds of their disability and then their manager deciding when they left not to give them a reference because they had claimed disability discrimination.

Harassment - this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature or may occur because someone has harassed the victim and the victim either rejects or submits to it and, because of that rejection or submission, that person treats the victim less favourably. More information on what can constitute harassment is set out in the NDA's Respect at Work policy.

Employees are expected to support the NDA in achieving these aims. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

How we Should Demonstrate EDI in Delivering the NDA Mission

NDA will seek to:

- Meet our legal obligations under the Equality and Human Rights Act 2010
- Encourage and embed equality, diversity and inclusion in all its employment activities
- Work with the NDA workforce, including:
 - Establishing and maintaining EDI Ambassadors
 - Engaging the Staff Consultation Group in its EDI plans
- Approach its activities proactively by:
- Minimising the potential for discrimination
- Minimising the potential for harassment and bullying
 - Seeking out opportunities to promote an inclusive culture
 - Seeking stakeholder feedback

Workforce

NDA is committed to equality, diversity and inclusion in all aspects of recruitment, performance management and employment. We will seek to achieve this in the following ways:

- Develop and implement recruitment and selection processes that are open and fair and that enable the selection of the best talent. Aim to build a workforce that reflects the communities it serves
- Promote an environment free from discrimination, harassment, bullying and victimisation and tackle any behaviour that breaches this
- Provide training support and encouragement to employees and workers so that they can develop their careers, enhance their contribution to the organisation and minimise the potential for bullying and harassment

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- Make all colleagues aware of their responsibility for promoting equality diversity and inclusion in their work
- Seek feedback and consult with appropriate groups on the development, implementation, and review of human resources policies, procedures and flexible working arrangements

Duties of all Colleagues

All colleagues have a personal role to play in ensuring their behaviors reflect the values of the NDA and contribute to a working environment that is inclusive and free from any kind of discrimination, harassment or bullying.

Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment and bullying will be treated as gross misconduct. Unwarranted allegations that are not made in good faith may also be considered as a disciplinary matter

Duties of Line Managers

It is imperative that the senior leadership team set the tone for the Corporate Centre and the wider Group.

Colleagues who have line management responsibilities have a duty to ensure they demonstrate the values of the NDA and encourage and promote an inclusive environment. Failure to take action to tackle discrimination, harassment or bullying will be considered a failure to fulfil responsibilities of their position. It is particularly important that Managers are aware of the impact of their behaviours on employees.

This policy does not prevent legitimate constructive criticism of employees' behaviours or performance. It is important, however, that managers undertake those conversations with professionalism and respect.

Grievances

Colleagues should treat each other with dignity and respect whilst at work. Any employee who feels they have not been treated in accordance with this policy is encouraged to raise the matter as per the NDA Grievance Policy. All complaints will be taken seriously and will be dealt with promptly, confidentially, fairly and with respect. The full grievance procedure can be found on Livelink.

Monitoring and Review

The NDA will regularly collect, monitor and analyse diversity data; including information about the gender, age, ethnicity, sexual orientation, religion and belief or disability information provided by employees and job applicants to make sure our employment processes are fair and to ensure we meet the aims of this policy and understand how we are progressing against our ED&I ambitions and goals.

The NDA will undertake a formal review of this policy at regular intervals or after significant changes in our business operations or legislation and communicate the changes.

Associated documents:

NDA Grievance Policy

NDA Respect at Work Policy

NDA Stress Policy

NDA Capability Policy

NDA Code of Conduct