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# Equality, Diversity and FIR Policy

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## 1. Introduction

GRAHAM is committed to being an employer of choice where everyone is recognised as an individual and where the richness of a diverse workforce at all levels is embraced to maximise business performance and to **deliver lasting impact**.

We are also committed to building strong, participative partnerships with the supply chain and our clients to ensure that best practice **Fairness, Inclusion and Respect (FIR)** is a trademark of our delivery at all levels and to build a platform for continuous improvement.

The principles of FIR help create a positive team culture, a safer and healthier workplace, more innovation through diversity of ideas and a more productive workplace - everyone thrives when we feel valued.

We expect all our people to be accountable for equality, diversity, and FIR at GRAHAM. It is only by working together inclusively that we can ensure that everyone can perform at their best.

This policy reflects that we see equality, diversity, and FIR as an integral part of everything we do at GRAHAM. It sets out how we will treat all job applicants, employees, contractors, Client staff, communities and other stakeholders with dignity, fairness, inclusion, and respect.

This is regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, or belief, sex, and sexual orientation.

GRAHAM are committed to being an inclusive workplace where all employees, customers and stakeholders can fully participate and contribute. We strive to ensure accessibility across all facets of our operations, including physical spaces, digital platforms, communication channels and services.

Our People policies are regularly audited against rigorous accessibility standards to ensure compliance and to support every employee.

Anyone who requires additional support or has any questions regarding accessibility can contact the HR team at [HR-GFM@graham.co.uk](mailto:HR-GFM@graham.co.uk) or the FIR team at [FIR@graham.co.uk](mailto:FIR@graham.co.uk)

## 2. Scope

This policy applies to all job applicants, employees, Agency workers and Supply Chain personnel. It includes all employees transferring into the business through TUPE terms and conditions, unless expressly stated otherwise in their contract with GRAHAM Asset Management Ltd. ("GRAHAM").

## 3. Policy

### 3.1. Responsibilities

The Policy is owned by the Chief Executive Officer. The Head of Equality, Diversity & FIR reporting to the HR Director is supported by the GRAHAM FIR

Steering Group and is responsible for implementation and management. The policy is reviewed at least annually and communicated to all relevant individuals.

Line-managers and the Leadership Team/Heads of Department are responsible for implementing the policy and role modelling inclusive behaviour and providing support to their staff and other stakeholders. They must act professionally with regards to recruitment, selection, training, and personnel administration and this will be reflected in all relevant job profiles and competencies.

Our people are responsible for championing equality, diversity, and FIR, understanding how the policy relates to their role, and reporting cases of discrimination, harassment, and unfair treatment.

### **3.2. Legal Obligation**

The Policy recognises the company's legal obligations under the following legislation:

#### **N Ireland**

- Rehabilitation of Offenders Act 1974
- Fair Employment and Treatment (Northern Ireland) Order 1998
- Human Rights Act 1998
- Race Relations (NI) Order 1997
- Equal Pay Act (NI) 1970
- Sex Discrimination (NI) Order 1976
- The Employment Equality (Age) Regulations (NI) 2006
- The Employment Equality (Sexual Orientation) Regulations (NI) 2003
- Equality Act (Sexual Orientation) Regulations (NI) 2006
- The Disability Discrimination Act 1995

#### **GB**

- Equality Act 2010
- Human Rights Act 1998

### **3.3. Purpose and Aims**

This policy sets out our commitment to:

- A GRAHAM that is free from discrimination and prejudice.
- Treat all people, regardless of their background, with dignity and respect – this includes: our people, those with whom we interact (e.g. service users and customers) and other stakeholders.
- Comply with UK equalities legislation and our other external obligations including equality standards set by contracts, regulatory requirements, accreditations, and good practice schemes.
- Uphold the fundamental principles and the values of GRAHAM.

- Make our people aware of their responsibilities and know how and where to seek support to actively uphold and champion equality, diversity, and FIR.
- Ensure that we attract and retain people from the widest possible diversity of backgrounds and experiences to and at all levels of the organisation.
- Ensure robust diversity-related data collection to better understand our people and stakeholders.

#### **4. GRAHAM Code of Conduct**

We place much importance on ensuring that our staff demonstrate the right behaviours and values.

The GRAHAM Code of Conduct outlines how staff are expected to behave in all aspects of their work. It sets out the attitudes and approach we expect from staff and managers – how we do things, how we treat others, what we say, how we say it and how we can expect to be treated.

Fairness, Inclusion and Respect is a cornerstone value of the Code of Conduct, and all staff are expected to demonstrate their understanding, support, and implementation of the Respect value and the overall Code of Conduct throughout their role.

We expect employees to ‘Speak Up’ where they experience or see behaviours that fall below the standards of the Code of Conduct.

#### **5. GRAHAM Equality, Diversity and FIR Standards**

No discrimination shall occur in the support and management of our people and delivery of our services, and all decisions shall be objective and fair with individual circumstances considered.

Our services will take a person-centred approach, and FIR considerations will be incorporated into processes and delivery to ensure that all our services are accessible to all; we prevent discrimination, and we protect the dignity of our service users.

We expect all our people will use appropriately inclusive language and behave in a way that will uphold the dignity of colleagues, service users, and stakeholders.

We commit to providing and supporting channels for our people to have their voices heard. This includes opportunities to network with one another, and feedback to organisational proposals. For example, annual and ongoing staff surveys and through employee networks

We ensure that recruitment & selection, and promotion is transparent, merit-based, and fair. We commit to providing recruitment and selection training, including training on inclusive recruitment, leadership and behaviours, to support these objectives. Further details are set out in our Recruitment and Selection Policy.

Where necessary we will make workplace adjustments to accommodate the needs of our people. Further details are set out in our Workplace Adjustment policy.

Create a working environment that values difference and is free from prohibited discrimination, victimisation, bullying or harassment. Any individual who experiences or witness's discrimination / harassment is encouraged to report it. All complaints will be taken seriously, thoroughly investigated, and dealt with in a sensitive, prompt and

effective manner. Further details are set out in our Dignity at Work, Grievance and Disciplinary policies.

The portrayal of under-represented groups within our marketing media will be balanced, and not reinforce stereotypes.

## **6. FIR PLAN AND FRAMEWORK**

### **6.1. FIR Plan**

The business seeks to achieve targets that will drive forward the FIR agenda and positively impact individuals. A Head of Equality, Diversity & FIR along with dedicated FIR strategic steering and operational project teams, which includes board level representation, develops, publishes, and reviews our annual plan. This plan establishes our public commitment and accountability to employees, clients, and other stakeholders.

We adopt an outcomes-based approach in the development of the FIR Plan, which is agreed with, and is wholly supported by, the Board of Directors who ensure that the necessary resources are available to achieve its effective implementation. Targets resulting from the plan are incorporated into our overall business plan and include reporting mechanisms to measure progress on an ongoing basis.

### **6.2. FIR Framework**

To ensure that we stay at the forefront of best practice, we have developed our own framework to manage FIR. All sites and offices must comply with the Framework to ensure standardisation of delivery.

The Framework includes designated FIR Ambassadors (certificated by Supply Chain Sustainability School (SCSS) at project level, representatives who provide support where needed; provides training for managers and employees on our FIR systems; and who provide a conduit for us to listen to and act on staff suggestions which drives continuous improvement.

Additionally, our Framework allows us to monitor, support and upskill our supply chain to ensure they have appropriate policies and procedures in relation to FIR.

## **7. Training**

All our people have access to training through mandatory and recommended routes to assist them to translate the requirements of this policy into practice.

This includes inclusive behaviours training for our people and inclusive leadership training for our senior teams, in addition to bespoke e-learning modules and managers guides, made available on our Learning Management System.

Disability confidence awareness training is available at all levels and training on supporting disabled staff available at line manager level and above.

GRAHAM provides specific training opportunities to underrepresented groups as part of a positive action approach to increasing diversity.

Additional support and bespoke training is available upon request from the HR team and external providers.

## 8. Monitoring and Compliance

All diversity-related staff, service users and complaints data, is captured and actively monitored and reviewed at least annually to ensure our policy and strategies are working effectively in practice and inform their ongoing development.

GRAHAM monitor employees based on their age, sex, sexual orientation, disability, religion and belief and ethnicity across a range of employment areas such as recruitment, training and development, staff survey and those leaving GRAHAM's employment where appropriate, and where the information gathered can be used to improve employment opportunities.

Equality monitoring data is subject to the Data Protection Act and will be treated in accordance with this Act, with only anonymised data being provided to internal or external stakeholders.

Diversity-related actions and targets within the corporate strategy are monitored, reported on, and reviewed at Group Board level.

The business sets equality targets to ensure equality of opportunity. For clarity, equality targets are not the same as setting or establishing quotas. *[Quotas involve setting aside several jobs only to be filled by a particular group. This restricts the opportunity for other people to fill these positions and would therefore result in unfair or unlawful discrimination].*

Procedures will be put in place to assess and monitor potential and existing partners, to confirm that their practices and behaviours are consistent with our commitment to equal opportunities. All partners must comply with our Third Party Code of Conduct and follow the GRAHAM FIR policies and procedures. We work collaboratively with our Supply Chain to help improve their growth and development in terms of EDI/FIR.

We undertake regular surveys to collect the views of our people, including seeking feedback in relation to diversity. This survey information enables analysis by demographics. We benchmark ourselves against ONS data for construction. Moreover, our aspiration is to be reflective of the demographic of the community in which we work.

Any breach of this policy will be promptly investigated; breaches by staff will be a matter for disciplinary action (see Disciplinary procedure), while intentional breaches by Client or Supply Chain personnel will be dealt with by the Dignity at Work Policy.

Anonymised equality and diversity monitoring information may be provided to external organisations to meet our contractual obligations or to comply with legislation (e.g. N Ireland Fair Employment annual return).

GRAHAM use data to drive decision making and develop action plans and SMART targets as outlined. We will review and improve our communications to staff and stakeholders to increase diversity and inclusion within the business, whilst encouraging and reinforcing the message to all relevant individuals to act according to our principles.

## 9. Relevant Policies

Equality is integral to all company HR policies which can be found on the Hub at [HR Policies](#)