

Country Standard Operating Procedure Equality, Diversity & Inclusion



Document Details

Document Reference	SMS-CSOP-P1-14 Equality, Diversity & Inclusion
Version	V7.0
Issue Date	March 2021
Review Date	March 2022
Document Approver	Group HRD
Document Author/Owner	Global Head of Diversity & Inclusion
Applicability	All employees of Serco Group plc and its subsidiaries within the UK and ROI covering all business divisions, operating companies and business units



Version history

Version	Date	Reason for release/version update	Issued by
4.0	Sept 2017	Reviewed and updated	ER CoE
5.0	June 2018	Amended terminology	ER CoE
6.0	February 2020	Admin review – updated OurWorld references to MySerco	Candice Turner
7.0	March 2021	Policy content reduced, re-ordered and simplified. Process and guidance content replaced with links to MySerco pages.	ER CoE

Document approval

Job Role	Name	Date approved
Group HRD	Anthony Kirby	March 2021



Contents

1	Purpose & Application	4
2	Equality	4
2.1	Public Sector Equality Duty	4
3	Discrimination	4
3.1	Types of Unlawful Discrimination	5
3.2	Third Party Discrimination	5
3.3	Discrimination complaints	5
4	Equality in the Employee Lifecycle	5
5	Equality Impact Assessments	6
6	Equality and Diversity training	6
7	Monitoring & Reporting	6
8	Responsibilities.....	6
8.1	Employees	6
8.2	Line Managers.....	6
8.3	MyHR	6

1 Purpose & Application

This document sets out Serco's policy on equality, diversity and inclusion. This applies to all employees of Serco within the UK (local exceptions may apply). The policy does not form part of any employee's contract of employment and may be amended at any time.

Guidance on equality processes, how to embed inclusion and diversity, and how to access the Inclusion Hub is available on mySerco:



Managers

Employees

2 Equality

Serco provides equal opportunities. We will not tolerate discrimination, bullying, harassment or less favourable treatment (either directly or indirectly) in recruitment or employment on the following protected characteristics, as listed in the Equality Act 2010 or as amended from time to time:

- Age
- Disability
- Gender - including gender identity and gender expression
- Gender reassignment / transgender status
- Marriage and civil partnership
- Sexual orientation
- Pregnancy, maternity, paternity and adoption
- Race – including colour, nationality, ethnic or national origin
- Religion or belief or lack of religion/belief
- Any other protected or defining characteristic as indicated in legislation and case law

2.1 Public Sector Equality Duty

Where we are delivering services on behalf of a Public Authority we have an obligation under Section 149 of the Public Sector Equality Duty. This requires us when carrying out public functions, to have due regard to:

- the need to eliminate conduct which the Act prohibits
- the need to advance equality of opportunity between persons who share a relevant protected characteristic and those who do not
- the need to foster good relations between people who share a relevant protected characteristic and people who do not.

3 Discrimination

Serco will not tolerate discrimination, victimisation, or any behaviour which undermines our values. This includes intimidation or victimisation or retaliation against anyone who makes a complaint of discrimination or who assists in an investigation of alleged discrimination or anyone who initiates a complaint of discrimination may also, once investigated, lead to disciplinary action.

3.1 Types of Unlawful Discrimination

- **Direct discrimination** where a person is less favourably treated because of a protected characteristic
- **Indirect discrimination** where a requirement or condition which cannot be justified is applied equally to all groups but has a disproportionately adverse effect on one particular group
- **Discrimination by association** where a person is less favourably treated because they associate with or have a connection to a person who possesses a protected characteristic other than marriage or civil partnership
- **Perception discrimination** where a person is directly discriminated against or harassed because others think they possess a protected characteristic
- **Harassment** where there is unwanted conduct related to one of the protected characteristics 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. It does not matter whether or not this was intended
- **Victimisation** where an employee is subjected to a detriment, such as being denied a training a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected if they acted maliciously or made or supported an untrue complaint in bad faith.
- **Failure to make reasonable adjustments** 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 the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

3.2 Third Party Discrimination

Third-party discrimination, harassment or victimisation occurs where an employee is discriminated against, harassed or victimised in relation to a protected characteristic, by third parties such as clients or customers. Serco will not tolerate such actions against employees, and the individual should inform their immediately.

Serco will fully investigate and take all reasonable steps to ensure such discrimination, harassment or victimisation does not happen again.

3.3 Discrimination complaints

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Grievance or Bullying and Harassment processes.

Managers must treat discrimination, victimisation and harassment as disciplinary offences and deal with them under the Disciplinary processes.

4 Equality in the Employee Lifecycle

Managers must take action to avoid unlawful discrimination in all aspects of the employee lifecycle including recruitment, promotion, opportunities for training, pay and benefits, working practices, transitioning, discipline, grievance and selection for redundancy.

Guidance on how to promote equality, diversity and inclusion in the workplace is available [here](#).

5 Equality Impact Assessments

Serco will review the impact of policies, procedures, products and services and their outcomes against equality protected groups and characteristics: Age, Disability, Gender, Gender reassignment/transgender status, Marriage and Civil partnership, Sexual orientation, Pregnancy, Maternity, Paternity and Adoption, Race, Religion or belief or lack of religion/belief, or any other protected or defining characteristic as indicated in legislation and case law. Action must then be taken to address or remove any identified impact and monitor it regularly.

Guidance on how to undertake an Equality Impact Assessment is available [here](#).

6 Equality and Diversity training

All employees will be provided with training on equality and diversity upon joining Serco and as required in relation to their role and area of the business.

Support will be provided for managers on this policy and the associated processes. Anyone with an involvement in the recruitment and selection process will receive specialist equality and diversity training.

7 Monitoring & Reporting

Serco will monitor age, gender, disability, ethnic origin, religion/faith, gender identity, and sexual orientation of the existing workforce and of applicants for jobs and will take any appropriate action to address any underrepresentation or barriers identified as a result. This information will be treated as confidential and it will not be used for any other purpose.

The Company will monitor, report on and publish equality and diversity information as per legislative requirements such as Gender Pay Gap reporting.

8 Responsibilities

8.1 Employees

- Complying with this policy
- Reporting any instances of discrimination, harassment or victimisation

8.2 Line Managers

- Complying with this policy, and applying it consistently
- Taking action to promote equality and avoid discrimination, harassment or victimisation
- Seeking advice from MyHR where required

8.3 MyHR

- Supporting Line Managers in applying this policy
- Supporting employees with any queries in relation to the policy
- Ensuring all necessary documentation is processed and information is recorded