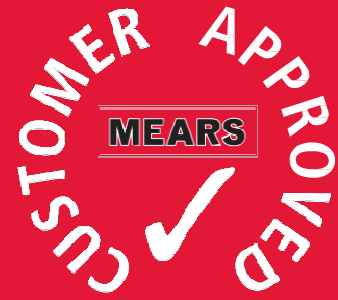

MEARS

Making People *Smile*



Mears forum



Equality, Diversity & Inclusion

THIS DOCUMENT IS AVAILABLE IN LARGE PRINT
AND MULTI LANGUAGE TRANSLATION AS REQUIRED

1.0 Introduction

The aim of this Policy is to act as a mechanism that drives positive behaviour around encouraging a truly diverse environment. Whether this is for employees, agency staff, sub- contractors, tenants, service users or clients. Through a strong delivery of the policy that robustly puts forward the current approach taken by the Group, we strive to create a transparently fair environment that evidences equality, diversity & inclusion for all.

2.0 Policy Statement

The Mears Group recognises that discrimination and victimisation is wholly unacceptable and is in direct contravention of the high standards required within a Mears environment. It is in the interests of the Company, its employees, contractors, clients and service users to utilise the skills of the total workforce. It is the aim of the Company to ensure that no one receives less favourable facilities or treatment (either directly or indirectly) on the grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the **protected characteristics**).

3.0 Our Aims

- To be fully committed to embedding equality, diversity and inclusion within all our policies and day to day operating practices
- To oppose all forms of unlawful and unfair discrimination, or victimisation, to provide equality and fairness for all
- To have a workforce that is truly representative of all sections of society, and the communities we serve where each employee feels respected and able to give their best
- To deliver a successful commercial operation that draws on One Mears Many Talents and empowers its staff by creating a fair and equal working environment
- To support clients and customers by working in partnership to ensure fair and equal access to all services provided through Mears Group PLC
- Our staff will not discriminate directly or indirectly, or harass customers or clients because of their age, disability, gender reassignment, marriage/civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services

4.0 Our Commitment

- To create an environment in which individual differences and contributions are recognised and valued
- To enable an environment that promotes dignity and respect to all
- To make training, development and progression opportunities available to all staff
- To promote equality in the workplace because we believe this constitutes good management practice and makes sound business sense
- To regularly review all our employment practices and procedures to ensure fairness for all
- Breaches of our equality policy will be regarded as serious misconduct and may lead to disciplinary proceedings, which on occasion could lead to dismissal.

5.0 Equality, Diversity & Inclusion Policy Review Record

In 2016 the Group formed a working party specifically to tackle and raise awareness and encourage, equality, diversity and inclusion across all sections of its day to day business. The working party is headed up by our Group Executive and Board Director, Alan Long and also has the benefit of external specialist guidance from

EW Group. The principal aim being to establish Mears as industry leading and embed a culture that is fair for all. The goals of the working group are:

- Create a diverse, highly skilled and engaged workforce at all levels to deliver even better services to clients and customers
- Create an effective diversity and monitoring system and capability to enable analysis, evidence-based decision making and tracking of progress
- Develop a clear action plan for diversity and inclusion which will be enforced
- Develop and deliver practical diversity and inclusion training for all staff. The top 300 managers will be trained to ensure the effective delivery Mears has of its management team. A tool kit is also available to ensure Mears reinforces its standards. In addition training delivered to develop the skills of our managers in dealing with a range of people management issues will encompass equality, diversity and inclusion.
- Develop clear accountability and competence on diversity and inclusion for all posts at all levels
- Ensure the diversity and inclusion steering group monitors and reports progress
- From understanding our baseline, set targets to increase the representation of women, and BAME people at middle and senior levels, and at all levels in Housing, and in Care increase the numbers of men at all levels, with clear and demonstrable year on year improvements
- Ensure that we understand the negative impact of unconscious bias, particular colleagues with the authority to recruit, promote and manage others
- Ensure we do not adversely affect any group on the basis of their protected characteristics, and enable the attraction and selection of the best talent through developing best practice recruitment and selection processes

The development history of our documentation is recorded to demonstrate we have reviewed and updated our Equality and Diversity Policy. The policy will be reviewed by the working party, at a minimum of every two years. We will communicate any changes to all employees, tenants, clients, suppliers and sub-contractors, and will implement them accordingly.

Equality and Diversity Policy first issue date: March 2010. Further reviews are as follows:

Review Date	Description of Changes
06/08/2012	Review of policy
16/12/2014	Review and update policy statement. Insertion of commitment
25/01/2016	Review and update policy statement
01/06/2017	Review and update policy statement

Mears 'Positive for Change' Customer Forum



- This document was reviewed by the Customer Forum on 06.08.2012 and 31.01.2014
- This document is due for review by the Customer Forum in July 17

6.0 Legal Compliance

As a Company we comply and strive to go beyond with the following legal requirements:

- Equality Act 2010 which consolidated the whole spectrum of Equality Legislation
- Criminal Justice and Immigration Act 2008
- Human Rights Act 1998

More information is available from the following sources (this list is not exhaustive):

Equality and Human Rights Commission:	www.equalityhumanrights.com
Government Equalities Office website:	www.equalities.gov.uk
Directgov:	www.direct.gov.uk
Acas:	www.acas.org.uk
Citizens Advice Bureau:	www.adviceguide.org.uk
Age UK:	www.ageuk.org.uk
Carers UK:	www.carersuk.org

7.0 Diversity: Our Strategy

The One Mears ethos is one of respect for people and we are fully committed to ensuring accessible services and opportunities to all. Our policies, procedures and working practices are designed to exceed government legislation and best practice in this area and to ensure that throughout the group no discrimination, either direct or indirect, is tolerated.

We are all different. We look different, like different things, worship according to different religions and have different outlooks on life. Diversity is a term that values peoples' differences and supports the belief that these differences benefit a successful business or community.

Our Diversity strategy aims to support our mission statement and from a clear understanding of our base line, ensure that take all positive and reasonable steps that on a year on year basis that achieves the following:

- Increase monitoring and our understanding to enable us to positively enhance customer satisfaction amongst all key community groups we serve
- Reflect the ethnicity of Mears employees to the demographics of our operational locations, as far as is practical. Encouraging and supporting employment and creating further opportunities where English is not the first language by translating relevant material
- Encourage and provide a greater diversity of our workforce at middle and senior management levels, including the board.
- Attract and retain more women in trades and more men in care
- No discrimination claims upheld against us, with any complaints investigated and appropriately resolved
- Our workforce voluntarily provide and we collect monitoring data on diversity strands for at least 80% of our employees and where possible applicants to our business
- Create a 'great place to work' through better colleague engagement resulting in better business
- Address the impact of an aging workforce, by valuing and respecting the benefits that older employees contribute
- More disabled people in our business by ensuring we recognise and make adjustments to ensure they are treated equally. Examples of Mears achieves this include:

- Adjust working hours or patterns
- Providing adaptations to the work environment
- Providing a BSL interpreter

8.0 Responsibilities

Diversity & Equality Working Party has overall responsibility to:

- Frequently review the approach adopted and to promote the equality agenda across the business.
- Put forward practical action plans to ensure equality, diversity and inclusion becomes part of the DNA or Mears
- Develop and deliver practical diversity and inclusion training for all staff
- Develop clear accountability and competence on diversity and inclusion for all posts at all level
- Ensure the diversity and inclusion steering group monitors and reports progress
- From establishing a clear base line we have targets to increase year on year the representation of women, and BAME people at middle and senior levels, and at all levels in Housing, and in Care increase the numbers of men at all levels
- Ensure that we understand the negative impact of unconscious bias, particular colleagues with the authority to recruit, promote and manage others
- Ensure we do not adversely affect any group on the basis of their protected characteristics, and enable the attraction and selection of the best talent through developing best practice recruitment and selection processes

The Group HR Director has overall responsibility for ensuring:

- HR people aims, strategy and policies are fully and demonstrably embedded within the organisation
- Monitoring and reporting systems are accurately maintained in a timely and verifiable manner
- The Group Board is updated with all matters relating to equality and diversity
- Identified issues are actively addressed and resolved fairly and consistently. All issues are reported to appropriate Board members detailing the corrective action that has been taken.

The Diversity Champions are established and empowered to:

- Support staff in understanding these aims
- Meet quarterly to review monitoring information and trends
- Examine and learn from any issues arising
- Recommend actions to improve fair and equal opportunities for all staff
- Support working arrangements with clients to promote equality and diversity
- Support customer services in ensuring equal access to a high standard of service
- Review monitoring information from our Supply Chain
- Provide input to the report presented to the Group Board meetings

9.0 Key Actions & Measures of Progress

Mears Equality, Diversity & Inclusion Strategy	How we achieve our goals.....
<p>That no job applicant or employee receives less favourable treatment on the grounds of any protected characteristic(s). Additionally no job applicant or employee will receive less favourable treatment on the grounds of union membership, other union activity, and responsibility for dependants or marital status. We recognition the rights of employees to be part (or not) of a collective association whether this is a trade union, employee forums or any other collective group. Indeed Mears has a number of formal and informal agreements with trade unions that it values in strengthening communication.</p>	<ul style="list-style-type: none"> ➤ Recruitment and Selection training for Line Managers ➤ Bullying and Harassment Training-covered at induction. ➤ Annual Investors in People Assessment ➤ Clear and confidential Grievance and Whistle Blowing procedures ➤ Proven acts of discrimination will not be tolerated and will be dealt with in the most severe way through the Company's disciplinary procedure. ➤ Where there is a need for retraining Mears takes this seriously and supports to ensure its standards of employment are not compromised. ➤ Mears supports and makes appropriate time available for trade union representatives to undertake their duties
<p>Selection criteria and procedures will be kept under review to ensure that individuals are selected, promoted and treated on the basis of their relevant merits and abilities.</p>	<ul style="list-style-type: none"> ➤ The HR department will monitor all recruitment and ensure all Managers follow procedure ➤ Competency interviewing to be reviewed to ensure suitability for all roles is clearly based on skills and capability
<p>All employees will be given equality of opportunity within the company's service and will be encouraged to apply for suitable vacancies.</p>	<ul style="list-style-type: none"> ➤ Appraisers will be fully trained in techniques that ensure staff are enabled to fully participate in their own and the Company's development ➤ Appraisal process where employees have the opportunity to discuss strengths, weaknesses, immediate objectives and future goals with their Line Manager
<p>The company is committed to a programme of action to make this policy fully effective. Having a locally employed workforce generally means we are able to ensure our workforce reflects that of the local area.</p>	<p>Policy to recruit using Intranet, Mears Group Website and Job Centre Plus. Job Centre Plus ensures links to the local communities within which we recruit. Wherever possible, working in partnership with our clients we would additionally expect to recruit through Client organisational structures.</p>
<p>The Company will ensure accurate employee data is held relating to Ethnicity, Religion, Gender/Gender reassignment, ability/disability, Sexual Orientation, Age, pregnancy/maternity, marriage/civil partnership</p>	<p>The Company will undertake a full survey of all employees. This survey will be repeated on a five yearly basis to ensure data is accurately maintained.</p>

Mears Equality, Diversity & Inclusion Strategy	How we achieve our goals
<p>The Company will monitor trends through our HR database on a quarterly basis to examine whether the stated policies are effective for all strands of diversity</p> <ul style="list-style-type: none"> ➤ Race ➤ Gender ➤ Ability/disability ➤ Sexual orientation ➤ Religion ➤ Age ➤ Transgender ➤ Marriage/civil partnership ➤ Pregnancy/maternity 	<p>All statistics will be sub-divided by Grade to enable analysis of opportunity to progress to the highest levels within our organisation.</p> <p>We will make sure of consultation and training to ensure trends progress in a positive direction.</p>
<p>The Company will monitor the proportion of staff at each branch who belong to the communities we serve, and endeavour to reflect the diversity of the local community.</p>	<p>Mears data will be compared to local demographics to monitor and progress a workforce that reflects the local community.</p>
<p>The company will monitor remuneration by job type, location and market forces to ensure that equality is achieved throughout all the protected characteristics.</p>	<p>If inequalities are identified, adjustments will be made to ensure fair and equal remuneration for all employees undertaking similar roles and responsibilities.</p>
<p>All employees will be canvassed annually for their opinions on the Mears approach to diversity.</p>	<p>This is included within the IIP & Engagement Survey (SWYS) processes, which are undertaken annually by the Company.</p>
<p>The Company will promote equality and diversity matters within our local communities through our Community and Environment Programme. Community and Environment Goal 2 – To reduce prejudice and improve understanding within our diverse communities.</p>	<p>Every branch is asked to undertake a local project each year which addresses local equality and diversity issues. This has the positive benefit of educating our staff, residents and clients about how we can work together for greater community cohesion.</p>
<p>Mears will be regarded as sector leading in ED&I</p>	<p>External accreditation and recognition:</p> <ul style="list-style-type: none"> ➤ Investors in People (IIP) ➤ Social Mobility Champion ➤ Sunday Times Top 30 Great Place To Work ➤ Diversity Network Accreditation, which focuses on outcomes, practice and impact ➤ TPAS Customer Engagement

These ambitious targets will be reviewed annually by the Equality, Diversity & Inclusion working party who will make recommendations to the Board and revised in line with positive practice in diversity and equality.

The following table outlines how Mears endeavours to deliver a fair and equal working environment, based on guidelines from the Chartered Institute of Personnel Development.

Chartered Institute of Personnel Development Standards	Mears delivers through
Values system based on respect and dignity for all	<ul style="list-style-type: none"> ➤ Management Training ➤ Employee Induction ➤ Ongoing policy and procedural reviews
Clear policy that everybody has a responsibility to uphold standards.	All policies are published on the Company Intranet and the Integrated Management System Database (IMS). Ongoing training and awareness programmes for all staff.
Address work-life balance	<ul style="list-style-type: none"> ➤ Flexible working policy ➤ Parental leave policies ➤ Study leave policy ➤ Family friendly policies
Initiatives	<ul style="list-style-type: none"> ➤ Investors in People (IIP) ➤ Age Positive ➤ The EDI vision & Strategy informs and improves policy development and review ➤ Equality and Diversity Champions ➤ Social Mobility champion
Develop initiatives to combat harassment	<ul style="list-style-type: none"> ➤ Bullying and harassment training, policy and procedures.
Open culture with good communication channels	<ul style="list-style-type: none"> ➤ Mears Matters quarterly magazine ➤ Mears Daily Matters emails ➤ Emails from Chairman concerning changes in business, access for all to Chairman's mobile number and email address ➤ Mears website communicates to external community ➤ Mears Connect (internal social media platform) communicates to employees ➤ Notice boards in every branch and office location
Training that supports the business' perspective on diversity	<ul style="list-style-type: none"> ➤ Employee induction emphasises Mears values, with specific section on creating awareness of ED&I ➤ Visible & accessible policies & procedures, for easy reference ➤ Making a Positive Difference Training, for front line colleagues, which focuses in more detail on Culture, Customer, Social Value & Diversity ➤ Specific Learning Modules available on request & delivered by Customer Success team/Diversity Champions ➤ Detailed ED&I training for our Top 300 Managers, which is endorsed by EW Group, focuses on setting the tone, awareness, skill & bias

10.0 Related Policies

- Recruitment Policies
- Induction Programme and procedures
- Training and Development Policy & Training Programmes
- Equal Opportunities Procedure
- Apprenticeship Procedure
- Bullying and Harassment Policy
- Family Friendly policies
- Flexible Working policy
- Grievance policy and procedure
- Disciplinary policy and procedure
- Maternity and Paternity policy
- Study leave policy
- Whistle Blowing policy
- Retirement Policy

11.0 Supporting our Clients and their Customers

- We endeavour to work closely with our clients to support their efforts to better understand the specific communities we serve and tailor effective services to meet those needs. We will take an active part in the Community through our Social Value activities and utilising geographic and demographic data to effect continuous improvement in delivered services. We have linked D&I through Social Value under 'Fair for All', which again makes it easier for colleagues to understand what they can do to make a positive difference
- All branches are supplied with a Social Value Calendar showing major religious festival dates
- Working within Public Sector Services it is of prime importance for us to provide equal access to our services and ensure everyone we come into contact with is treated with dignity and respect
- The Customer Success team will consistently review all best practice documentation to ensure it meets the needs of its diverse customer groups. The Customer Success team has produced a series of training and supporting guides and tools to ensure this is achieved
- For further information on all training, guides and supporting material available for use please contact customer.success@mearsgroup.co.uk
- These tools are devised to ensure all customers are able to easily access our services and enable us to treat them with fairness, dignity and respect
- We have been and will continue to be assessed on our range of services within Tenant Engagement by the Tenant Participation Advisory Service (TPAS). We were re-accredited in 2016 for a further three years on the basis of the quality we offer in the delivery of our services
- Material includes:
 - Making a Positive Difference Training – D&I specific
 - Equality and Diversity Best Practice Guide
 - Mears Customer Success Handbook for End User Customers
 - All customer collateral produced in Braille
 - Language Line

12.0 Supporting and Mentoring our Supply Chain

Procurement Strategy

- To ensure all suppliers to Mears understand our aims with respect to equality and diversity and that they also make appropriate efforts to ensure their own organisations
- Have in place satisfactory policy and procedures relating to equality and diversity
- Do not tolerate any form of discrimination, harassment or bullying
- Can demonstrate regular reviews of these policies and improvements in their internal monitoring procedures
- Can demonstrate their policies are effective
- We will achieve this by issuing our key supply chain with a **Supplier Commitment Document**, which clearly sets out expectations around ethical procurement, social value and diversity & inclusion
- To regularly review our own procedures relating to procurement to ensure they continue to reflect Mears' and their Clients' aims and strategies for equality, diversity & inclusion
- To ensure wherever a formal tender and evaluation process is being undertaken for preferred partners, Equality and Diversity policies will have a clear mark within the evaluation scoring system
- In all cases, supplier selection and approval will have an element relating to equality diversity & inclusion, either in the form of written reports or questions, combined with the supply of example policy documents

Monitoring Supply Chain

- As part of the 'Supplier Commitment' process, suppliers will be asked to prove they are a company we want to do business with and articulate and evidence their business case in these areas. Suppliers will be expected to submit evidence at least every two years
- An initial report as part of the supplier approval process will be needed and annual reports will be required from all suppliers thereafter on simple monitoring data for each of the diversity strands. These reports will be reviewed and suppliers challenged where results appear negative. Dependent on the size of the organisation and the proportional annual spend by Mears, varying levels of data will be required, with greater expectations placed on the major suppliers and preferred partners
- Any supplier found to have more than 2 valid discrimination cases upheld against them per 100 employees within any 12 months will be removed from the approved supplier list
- Suppliers who do not evidence their commitments every two years, could see their package of work decrease as a result

Training and evaluation of sub-contractors

- Mears are familiar with the use of small, local sub-contractors to support the peaks and troughs associated with housing services. Mears will look to encourage and support such small local businesses.
- Mears will support smaller sub-contractors by ensuring awareness of Mears requirements with regard to Diversity and Equality. This will include provision of induction material and standards for customer care through specific TPAS accreditation
- An Equality, Diversity & Inclusion Best Practice Guide, produced by our Customer Success Team is available to all employees, clients, tenants, sub-contractors and suppliers
- Equality, Diversity & Inclusion is discussed with sub-contractors and Suppliers during one to one meetings with Procurement
- Suppliers and sub-contractors to Mears Group Plc are required to give evidence of their equality and diversity practices during the PQQ process
- With respect to the smaller sub-contractor the Mears evaluation procedures for approval will identify any weaknesses in Equality, Diversity & Inclusion and allow the sub-contractor time to comply with Mears requirements, provided that all other aspects relating to required services are in place

- With respect to the smaller sub-contractor the Mears evaluation procedures for approval will identify any weaknesses in Equality, Diversity & Inclusion and allow the sub-contractor time to comply with Mears requirements, provided that all other aspects relating to required services are in place
- Mears would look to actively support any black, minority ethnic or other diversity initiatives in local employment cooperatives that might be suitable trade suppliers/partners for Mears

13.0 Communication & Improvement

As a business we understand that communication is key to implementing an effective equality and diversity strategy. We endeavour to effectively communicate equality and diversity by establishing the following:

- A dedicated working team of diversity champions who are representative of each area of the business.
- The equality, diversity & inclusion strategy is available to all Mears employees via Mears Connect & the IMS database
- Equality, Diversity & Inclusion is an essential component of induction for all new employees and TUPE staff
- From Q3 2017 an Equality Diversity & Inclusion report will be produced and sent to the Mears Group Plc board quarterly, through the regular encouragement with the assistance of the introduction of the implementation of the new Core HR system to measure new and existing staff diversity data to collect and analyse.

Employment Law and Changes in Legislation

Mears Group Plc ensures that its Managers are kept up to date with employment law and any changes in legislation by the following means:

- The in-house legal team generally
- The Group HR Director (who is also an Employment Solicitor) regularly briefs the HR teams on any changes to the law
- The HR Business Partners, HR Advisors and HR Service Centre then facilitate this communication amongst Managers offering support and guidance when required

Monitoring Compliance with Equality and Diversity

Reports concerning equality and diversity are produced on a monthly basis for the Mears Group PLC Board of Directors. Here, compliance is monitored and areas of concern are discussed.

Continuous Improvement

As a business we understand that in order to continue to manage diversity effectively our strategy needs to continuously improve. We aim to support this by:

- Attending industry seminars/ conferences where diversity is a key agenda item
- Keeping abreast of all and any relevant legislation
- Being members of third party organisations that promote and support work with diverse groups, e.g. Stonewall; Age Positive; Social Mobility Champions
- Developing diversity networks within Mears and with our clients
- Having regular Investors in People Assessments
- Regular communication with all employees
- Strong and influential leadership that demonstrates the right behaviours
- Capturing & analysing accurate employee data
- Analysing customer satisfaction data with respect to diversity matters
- Monitoring of Supply Chain to ensure suppliers meet with Mears standards

- Monitoring employment trends, recruitment, appraisals, development and career opportunities, pay scales, employee feedback
- Identifying root causes of adverse trends and taking corrective action
- Identifying specific issues and implementing appropriate solution
- Regularly reviewing strategy, policies and procedures to maintain a focus on feedback and improvement



Signed:
Alan Long – Group Executive Board Director