

EQUALITY, DIVERSITY AND INCLUSION POLICY

1 POLICY

Oxford International is firmly committed to equality and diversity in all areas of our work. As part of their responsibilities under the Equality Act 2010, Oxford International has a duty to promote equality of opportunity as well as tackling unlawful discrimination (whether direct and/or indirect and this also incorporates victimisation). We believe that diversity is a means to achieve our ambitions. Equality and diversity is about outreach, inclusion and service delivery as well as the people we employ and involve in our work.

We care about diversity, equality and inclusion and believe that we have much to learn and profit from diverse cultures, experiences and perspectives, and that diversity will make our organisation more effective in meeting the needs of all our stakeholders. It is therefore everyone's responsibility, not just the responsibility of directors and managers, to make sure that diversity and inclusion is promoted throughout Oxford International.

It is the policy of Oxford International to treat all employees, students, service users, contractors and job applicants fairly and equally, regardless of their age, disability, race, racial group, ethnic or natural origin, or nationality, marital / civil partnership status, religion and belief, pregnancy, maternity and paternity, gender and sexual orientation. Furthermore, Oxford International will ensure that no requirement or condition will be imposed without jurisdiction which could disadvantage individuals purely on any of the above grounds.

Under the Equality Act 2010 we will ensure that the following characteristics are protected:

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

Training is available via the company's usual provider, iHASCO, on Equality and Diversity in the workplace. All Oxford International employees should complete this training as part of our commitment to promoting equality and diversity at work, and eliminating discrimination as far as is reasonably practicable.

This policy can be found on the OIEG intranet, as well as our corporate website.

2 AIMS AND SCOPE

The overall aim of this policy is to:

- Eliminate unlawful discrimination
- Ensure that we treat all individuals fairly, with dignity and respect
- Promote equality of opportunity
- Promote equality of access
- Provide a safe, supportive and welcoming environment - for staff, contractors, volunteers, service users and visitors.
- Integrate our values into our work

This policy applies to every employee, prospective employee, student, contractor, volunteer, service user or supplier connected with Oxford International.

This policy forms part of the formal contract of employment for employees and Oxford International. All members of the organisation must abide by this policy - albeit that those in senior or managerial positions or with specific responsibilities for recruitment, selection, training, appraisal and promotion should be especially mindful of the policy. Any failure to comply may result in disciplinary proceedings.

3 RESPONSIBILITIES

The Chief Executive Officer and senior management team has lead responsibility for promoting and ensuring compliance with this policy.

Directors and all employees with managerial or supervisory responsibility, have responsibility for implementing, monitoring and promoting this policy within the workplace.

All employees have a responsibility to work to the policy in all areas of their work, individually and collectively. Employees must make sure they do not:

- Discriminate against anyone
- Persuade or pressure another employee to discriminate
- Harass, bully or abuse other employees or the public for any reason
- Condone harassment

If anyone witnesses a discriminatory incident at work, they have a duty of care to others to challenge such behaviour and practice.

If an employee does not follow these and other requirements of this policy, it will be dealt with under the Disciplinary Policy and Procedure.

4 EQUALITY AND DIVERSITY AT WORK

All organisation policies and benefits are designed to promote equal opportunity and protection for all employees, contractors and volunteers. In order to ensure that equality underpins all aspects of our employment policies, procedures and practices, we will, as far as is reasonably practicable:

- a) not unfairly discriminate against any job applicant or employee and, when recruiting, only consider factors which are relevant to someone's ability to perform the job well
- b) aim to create a workforce that is as diverse as the community we serve
- c) treat all employees and job applicants fairly in relation to all our employment policies and procedures and meet any reasonable and appropriate additional needs they may have
- d) value and respect the identities and cultures of our employees, volunteers, contractors and service users

- e) work towards a workplace that is free from discrimination, bullying and harassment and will act promptly on any complaints of discrimination, bullying, harassment or victimisation
- f) provide a safe working environment
- g) make the workplace, and information about work, as accessible as we can for all our employees
- h) give our employees clear information about job selection and training and encourage all employees to reach their full potential
- i) make sure that we work according to the relevant employment legislation and statutory codes of practice
- j) continue to develop good practice employment policies and procedures over and above those required by legislation
- k) apply this Equality and Diversity Policy through the organisation's recruitment and selection process, training programmes, grievance procedures and all other employment policies
- l) give employees and job applicants access to complaint procedures if they feel unfairly treated

5 COMMITMENT TO SERVICE USERS

Service users and potential service users can expect Oxford International to aim to:

- Design and deliver appropriate, accessible and effective services to all members of the community
- Work in partnership with others to promote equality and diversity
- Make sure that we provide services that comply with relevant legislation and statutory codes of practice
- Continue to develop good practice policies and procedures over and above that required by legislation
- Act promptly if we receive any complaints about the way we provide services
- Ensure complaints of anti-discriminatory practice are taken seriously and dealt with in line with the organisation's complaints policy.

6 EMPLOYMENT PRACTICES

All employees have a personal responsibility to adhere to the principles of equal opportunity and maintaining harmony. Oxford International will actively promote equal opportunities in all our operations to ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential skills and abilities. Employees will be recruited and selected, promoted and trained on the basis of objective criteria. Any form of discrimination and/or harassment will not be tolerated and Oxford International will treat unfair discriminatory conduct by any employee as a disciplinary offence.

6.1 Recruitment

Recruitment is carried out on the sole basis of the applicant's abilities and suitability for the job. Age, disability, race, racial group, ethnic or natural origin, or nationality, marital / civil partnership status, religion and belief, pregnancy, maternity and paternity, gender and sexual orientation will not justify the non-recruitment of an applicant.

No applicant will be considered unsuitable for appointment, or less suitable than another applicant, on grounds of age, disability, race, racial group, ethnic or natural origin, or nationality, marital / civil partnership status, religion and belief, pregnancy, maternity and paternity, gender and sexual orientation. .

Any job vacancies that are advertised internally or externally (for example via agencies or in the written press) will carry an equal opportunities statement.

Oxford International will not discriminate against anyone who has a spent conviction under the Rehabilitation of Offenders Act 1974. Having a criminal record will not necessarily bar an applicant from working or using services provided by Oxford International. This will depend on the nature of employment and the circumstances and background of an applicant's offence(s).

6.2 Harassment at work

Harassment is unsolicited and unwelcome workplace behaviour that adversely affects the dignity of the recipient. Where such behaviour is motivated by age, disability, race, racial group, ethnic or natural origin, or nationality, marital / civil partnership status, religion and belief, pregnancy, maternity and paternity, gender and sexual orientation it also amounts to infringement of equality and diversity policy.

Oxford International is committed to ensuring that no harassment or victimisation at work, whatever the motivation, is overlooked or condoned. Such behaviour can range from extreme forms such as violence or bullying to less obvious actions like practical jokes and ridiculing colleagues or subordinates.

Conduct becomes harassment if it persists after the recipient has made clear that it is regarded as offensive, although a single offensive act can amount to harassment if it is so serious as to be obviously offensive towards the recipient.

Any form of harassment is a potential disciplinary matter and will be dealt with under Oxford International's disciplinary process and procedures.

6.3 Pay

Men and women are entitled to be paid equally without any bias on the grounds of sex.

All reasonable steps will be taken to ensure that male and female employees receive equal pay for the same work and for work rated as equivalent and for work of equal value.

7 TRAINING AND DEVELOPMENT

Oxford International is committed to a process of continual learning and development for all employees and will train, develop and promote on the basis of merit and ability only, and will encourage employees and applicants from regardless of age, disability, race, racial group, ethnic or natural origin or nationality, marital / civil partnership status, religion and belief, pregnancy, maternity and paternity, gender and sexual orientation.

8 COMPLAINTS PROCEDURE

Oxford International wants to promote a 'Speak Up' culture so that everyone has the confidence to tell someone in authority if they feel that they have been unfairly treated and have the confidence that they will be listened to and their complaints dealt with properly. In particular complaints are to be dealt with quickly, at the lowest appropriate level and sensitively. All complaints are to be recorded

and the details reported accurately in accordance with extant policy, and the outcome of any procedure must remedy the situation.

Any service user who wishes to raise complaint can do so under Oxford International’s Complaints policy and to make sure that complaints are routinely recorded and each is fully investigated. All staff should expect to be treated with dignity and respect whilst at work, and have an equal responsibility to treat their colleagues similarly. Any employee who feels they have not been treated in accordance with this policy is entitled to raise the matter through the Company Grievance Procedure or the Whistleblowing Policy. All complaints will be dealt with seriously, promptly and confidentially. If a member of staff is found to have breached the Equality and Diversity Policy they may be subject to disciplinary action under the Company Disciplinary Procedure, which could result in dismissal.

Anyone wishing to raise a concern should speak to their line manager, or a member of the HR team. Oxford International has also partnered with NAVEX Global, an independent whistleblowing platform. Reports can be made to NAVEX anonymously by visiting: oxfordinternational.ethicspoint.com

Or phoning 0-800-89-0011 and at the prompt calling 833-604-0808

9 MONITORING AND IMPLEMENTATION

There will be a will review of this policy to ensure it is appropriate and responsive to relevant legislation- current lead responsibility for reviewing this policy sits with the Chief HR Officer, along with the CEO and Executive Team. Amendments to the policy will be made, where appropriate, in the light of experience or changes in guidance and/or legislation.

We will ensure effective implementation of this policy by:

- Actively promoting it
- Circulating it to all colleagues, job applicants, contractors and volunteers, as well as placing it on the organisation’s intranet and corporate website
- Consulting regularly and providing appropriate training and guidance, particularly to line managers, to make sure that they understand this policy and their legal responsibilities
- Taking appropriate action to deal with any breach of this policy
- Monitoring statistics to identify inequality and/or under-representation.

From time to time statistical information will be recorded and collated in order to generate data (amongst others) that will enable Oxford International to examine whether certain groups may be disadvantaged by any aspects of its policies or practices. The results of monitoring will be shared Oxford International’s Executive team.

| | |
|---------------------------|---|
| <u>Policy owner</u> | Chief HR Officer |
| <u>Review date</u> | January 2024 |
| <u>Summary of changes</u> | Expansion of protected characteristics throughout |
| <u>Next review date</u> | January 2025 |