Newgrove Limited

Equal Opportunities Policy

Document ID: POL-009

Version No: 2.0

Status: Approved

Issue Date: 18 October 2026

Classification: Client-shareable

Copy Number ……
Issued to ……
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Date ……

Newgrove Limited. Company No: 02775618, VAT No: GB 666 2978 82
Registered at Cardiff. Registered Office: 4th Floor, One Kingdom Street, Paddington Central, London W2 6BD
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Version History

Version	Date	Author	Change	Approved by
1.0	November 2019		Original issue; approved as issued	
2.0	2026-10-18	Information Security Team	Full refresh of the November 2019 policy; changes recorded in the policy's change log	Chief Technical Officer

Document Control

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Issue date (this version):	2026-10-18
Approved by:	Chief Technical Officer
Approval date:	2026-10-18
Effective date:	2026-10-18
Next review date:	2027-09-30
Owner:	Chief Executive Officer
Scope:	The policy applies to:
Review and consultation process:	Drafted or reviewed by the Information Security Team and approved by the Chief Technical Officer (PRC-001). Full review each September and an interim check each March, and after any decision, incident, legal change, client requirement or audit finding that affects it.
Distribution methods:	The controlled master is held in the compliance repository (git) maintained by the Information Security Team, with the approved text tagged by version. Released copies are published to SharePoint. Staff and clients receive exported PDF/DOCX copies of approved documents only; clients receive only documents classified public or client-shareable (PRC-001).
Associated documentation:	POL-014 Corporate Social Responsibility Policy POL-010 Health and Safety Policy PRC-009 Joiners, Movers and Leavers, and Access Reviews POL-011 Anti-Bribery and Corruption Policy POL-007 Staff Handbook
Supersedes:	SRC-0006 Newgrove - Equal Opportunities Policy November 2019 (Word)
For further information please contact:	Chief Executive Officer, Newgrove Limited E-mail: support@newgrove.com Web: newgrove.com
Source:	policies/POL-009-equal-opportunities-policy.md at commit 3fbb902482

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1. Purpose

Newgrove is committed to equal opportunities and to a working environment free from discrimination, harassment and victimisation. It values a diverse team chosen on ability. This policy sets out how Newgrove meets the Equality Act 2010 in recruitment, employment, development and the way people treat each other.

2. Scope

The policy applies to:

- every stage of employment: recruitment, terms and conditions, pay, training, promotion, discipline and leaving
- employees, job applicants, workers, contractors and consultants
- conduct towards colleagues, clients and suppliers, whether online, in meetings or at events

Staff based outside the UK are also protected by the law of the country where they work.

3. Policy statements

Equal treatment

3.1 Nobody receives less favourable treatment, or is put at a disadvantage by a requirement that can't be justified, because of any protected characteristic. The protected characteristics are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

Part-time and fixed-term workers are treated no less favourably than comparable full-time and permanent staff.

Recruitment and promotion

3.2 Job adverts and descriptions give clear, accurate information, and include only requirements that are necessary for the job. A requirement limited to one group is used only where the Equality Act allows an occupational requirement, and is stated in the advert.

3.3 Vacancies are advertised in ways that don't restrict who can apply. Where internal candidates exist, vacancies are also circulated internally.

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3.4 Selection, promotion and pay decisions are based on objective, job-related criteria and on merit. Questions about personal circumstances are asked only where they relate to the job, and then of every candidate.

3.5 Reasonable adjustments are made for disabled applicants during recruitment. For disabled employees they are made at work, including at home-working locations, for example equipment or working patterns.

Development and working arrangements

3.6 Everyone has fair access to training and development.

3.7 Requests for flexible working are considered fairly and promptly, as the law requires (Staff Handbook §8).

Harassment and victimisation

3.8 Harassment, including sexual harassment, bullying and victimisation, is not tolerated, from colleagues, clients or anyone else Newgrove staff deal with. This applies online and in remote meetings as well as in person.

3.9 Newgrove takes all reasonable steps to prevent harassment of its staff, including sexual harassment and harassment by clients and other third parties. The law requires employers to take reasonable steps to prevent sexual harassment (Equality Act 2010 s.40A). From 30 October 2026 the Employment Rights Act 2025 raises this to all reasonable steps, and employers must not permit a third party to harass an employee; they are treated as permitting it if the harassment happens in the course of employment and they did not take all reasonable steps to prevent it (Equality Act 2010 s.40(1A)-(1C)). The steps are: this policy; a short harassment risk assessment, reviewed each September; awareness at induction and in refresher training; the reporting route in section 5; and prompt action on every concern.

3.10 Nobody will be treated badly for raising a concern or complaint, or for supporting someone else's, in good faith.

4. Roles and responsibilities

Role	Responsibility
Chief Executive Officer	Owns this policy. Makes sure recruitment, pay and promotion follow it. Handles concerns and complaints
Chief Technical Officer	Receives and handles concerns that involve the Chief Executive Officer, taking advice from Newgrove's insurer legal advice services
Everyone	Treats others with dignity and respect, and raises concerns

5. Compliance, monitoring and exceptions

Raising a concern

- Concerns about discrimination, harassment or victimisation are raised with the Chief Executive Officer, informally or under the bullying and harassment procedure (§30) or the grievance procedure (§32) in the Staff Handbook.

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- A concern that involves the Chief Executive Officer goes to the Chief Technical Officer, and one that involves the Chief Technical Officer goes to the Chief Executive Officer. Whoever handles it takes advice from Newgrove's insurer legal advice services, and may engage an independent HR consultant to hear an appeal. Staff can also contact Acas.
- Every complaint is taken seriously, investigated promptly and kept confidential as far as possible.

Consequences

Discrimination, harassment or victimisation is misconduct and may lead to action under the disciplinary procedure in the Staff Handbook (§33), which follows the Acas Code of Practice, up to dismissal.

Communication and review

- All staff are made aware of this policy at induction (Joiners, Movers and Leavers, and Access Reviews procedure).
- Reviewed in full each September, with an interim check each March.

6. Related documents

- Staff Handbook: bullying and harassment §30, grievance §32, disciplinary §33, flexible working §8 (held in SharePoint)
- Corporate Social Responsibility Policy; Health and Safety Policy
- Joiners, Movers and Leavers, and Access Reviews (recruitment checks, induction)

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