

Equality, Diversity & Inclusion Policy

Author: Mary de Villiers
Revision: 5
Review Date: October 2025

Date: December 2012
Revised: October 2023

Equality, Diversity & Inclusion Policy

Our Commitment

At TTC we are committed to providing an inclusive working environment where everyone feels valued and respected. We recognise that people from different backgrounds, experiences and abilities can bring fresh ideas and innovations to improve our working practices and business.

Who is covered by this policy?

This policy covers all colleagues, contractors, temporary workers, agency workers, secondees and job applicants including any individuals working on TTC premises via a third party. This applies to all aspects of employment, from recruitment and selection through to termination of employment.

Reasons for having an Equality, Diversity & Inclusion Policy

We have a diverse customer base, one that expects to be served by people with whom they can identify, and our aim is to ensure that this expectation is met and maintained. Encouraging everyone who has contact with TTC to celebrate their own diversity and that of their colleagues is key to our values and critical to our business success.

Equality legislation and associated regulations exist to protect colleagues, customers, contractors and clients. TTC recognise our responsibilities and obligations under the **Equalities Act 2010** hence we have a number of policies and procedures in place to ensure a responsive approach.

How does TTC demonstrate this commitment?

In our continuing effort to ensure that diversity is embedded in our culture, reflected in our people and to better serve our customers we will endeavour to:

- Develop and implement recruitment and selection processes that are open and fair and that enable the selection of the best talent.
- Aim to build a workforce that reflects the communities that we serve.
- Promote an environment free from discrimination, harassment, bullying and victimisation and tackle any behaviours that breaches this.
- Make all employees and workers aware of their responsibility for promoting equality diversity and inclusion in their work.
- Continuously strive to understand the impact of our services on our customers and colleagues and where challenges are identified work to remove or reduce them.
- Remove or reduce barriers through appropriate consideration of reasonable adjustments.
- Increase our ability to relate to existing and potential customers wherever they exist,
- Build effective relationships in the wider community through partnerships with community-based groups.
- Fully utilise the talents of all TTC colleagues.
- Improve recruitment and retention from all people groups.
- Ensure that employment decisions are based on business needs and the individual's ability to do a job.
- Enhance decision making and innovation, by encouraging interaction and involvement.

TTC will take the following steps to ensure that this policy is put into practice:

- Managers and colleagues in key decision-making areas will be trained on the potentially discriminatory effects of imposing practices, conditions, and criteria on minority groups, and the importance of being able to justify decisions.
- Ensure all employees complete the annual mandatory training on equality, diversity, and inclusion.
- Complaints about discrimination or harassment will be regarded seriously and investigated which may result in disciplinary sanctions, and even dismissal.
- Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity, or any other characteristic protected by national legislation.
- All colleagues will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities within TTC.
- Selection criteria will be exclusively related to the job or training opportunity.
- Ensure that all contracts for goods, facilities or services include a clause prohibiting unlawful discrimination by contractors and their staff, and by any sub-contractors and their staff.
- The effectiveness of the policy and strategy will be monitored at regular intervals.

The benefits of diversity management

A diverse workforce can offer a wide range of resources, skills, ideas, and energy to the business, providing a competitive edge. Organisations that embrace diversity will reap the benefits of resourcing from a wider pool of talent, broaden their markets, improve productivity, and raise the community profile.

Diversity management can benefit TTC in a number of ways, i.e.

- Improve opportunities within the organisation through internal promotion.
- Utilise the knowledge of different areas of the community.
- Understand market segments and consumer behaviour.
- Become an employer of choice.
- Have a more representative 'balanced' workforce.
- Value and respect colleagues, attracting and retaining a wider talent pool.
- Cost benefit of proactively managing health and wellbeing.

Inclusivity at TTC

Definition:

Inclusivity, within the context of TTC, means fostering an environment where all individuals, irrespective of their diverse characteristics or backgrounds, feel valued, accepted, and integral to the team. It implies an active effort to ensure every voice is heard, valued, and considered in our decision-making processes.

Our Commitment to Inclusivity:

At TTC, we believe that diversity is our strength, but inclusivity is our action. Our commitment to inclusivity goes beyond just recognising diversity. It's about actively embracing the different insights,

perspectives, and strengths that every individual brings, creating an environment where everyone can thrive.

Key Aspects of Inclusivity at TTC:

- **Open Dialogue:** We encourage and reward an open culture where colleagues can speak up, share ideas, and voice concerns without fear of retribution. By doing so, we tap into diverse perspectives that can drive innovation and creativity.
- **Decision-Making:** Inclusivity is central to our decision-making processes. We aim for diverse representation in teams, and leadership roles to ensure a variety of viewpoints are considered.
- **Flexibility:** Recognising that everyone's needs and circumstances are different, we offer flexibility in work arrangements where possible, catering to different life stages and personal commitments.
- **Feedback Mechanisms:** Inclusivity is a continuous journey. We have established feedback mechanisms, such as surveys to understand where we are succeeding and where improvements are needed.

Responsibility:

All colleagues, irrespective of their roles, have a part to play in promoting and maintaining an inclusive environment. Managers and team leaders have a special responsibility to model inclusive behaviour and ensure that their teams are free from any form of discrimination, bias, or exclusion.

Review and Continuous Improvement:

Our approach to inclusivity will evolve as we learn, grow, and adapt. We are committed to a continuous review of our efforts and actively seek ways to enhance our inclusivity initiatives.

Who takes responsibility to make sure this policy works?

All Colleagues

- All colleagues have a responsibility to ensure that this policy is put into practice. We expect a personal commitment from all colleagues in making it effective and in setting an exemplary standard for others to follow.
- Additional and specific responsibilities apply to those who manage staff and to those who are involved in recruitment, promotion, training and development.
- All individual colleagues have a responsibility to:
 - Understand the value and benefits of diversity.
 - Familiarise themselves with this policy, follow it, and ensure that any staff for whom they are responsible do so as well.
 - Draw to the attention of their line manager any instances of apparent discrimination or any perceived problem in relation to employment or to the provision of products and services.
 - Comply with and promote TTC policy and procedures with regard to managing equality, diversity and inclusion.

All Managers

- Ensure that policies and procedures relating to equality and diversity are implemented and communicated to all existing staff and new staff on their commencement, this is traced through the HRIS.
- Promote a professional and positive work environment by ensuring that this policy is put into practice by challenging behaviour, actions or decisions that breach the policy.
- Informing customers of the policy, overseeing requests for reasonable adjustments or managing customer complaints (see Complaints/Dispute Resolution & Escalation Policy).
- Take timely and appropriate action for the resolution of issues relating to bullying and harassment (see Anti-Harassment and Bullying Policy), and discrimination in their work area, in accordance with HR policies and procedures, including the Disciplinary Policy where necessary.
- Raise awareness of diversity, act as a role model for others, and develop personal skills in order to handle issues relating to bullying and harassment, and discrimination.
- Managers must also ensure that other stakeholders i.e. customers (commissioners); suppliers with whom TTC has service level agreements; and clients (upon request) receive a copy of this policy.

The Board of Directors has corporate responsibility for:

- Ensuring that this policy underpins all aspects of our work.
- Leading by example and promoting an organisational culture that is supportive of the benefits of diversity.
- Ensuring that the policy is implemented in their particular areas of responsibility, including business plans and objectives for national and regional action.
- Developing the organisational culture in which this policy can operate effectively.
- Ensuring that this policy is implemented across all areas of the business.
- TTC Board of Directors is responsible for ensuring that the Business Plan, team and individual objectives are set by managers that demonstrate policy into practice with respect to equality and diversity e.g. selection & recruitment; absence monitoring; performance; procurement; complaint procedures; not only capture but reports upon equality data.
- TTC Board of Directors is responsible for reporting on progress against diversity targets on an annual basis and for ensuring that this is communicated to colleagues, job applicants and customers.
- TTC will review this policy on an annual basis.

How do we monitor this policy to ensure that it is working?

We will regularly collect, monitor and analyse information on the gender, age, ethnicity, and disabilities of colleagues and applicants to assess the application and effectiveness of this policy, and highlight areas to be addressed. The information will be held in strictest confidence and will only be used to promote diversity and prevent unlawful discrimination.

Any patterns of under-representation (for example, where one gender or race appears to have a consistently reduced chance of promotion) will be fully analysed in conjunction with HR, and potential discriminatory practices identified and removed.

In terms of customer service, we will continue to assess any perceived or real barriers to access experienced by individuals or groups on the grounds of any of the protected characteristics. For

example, TTC in partnership with Aston University and a KTP Researcher conducted an independent longitudinal study into the impact of speed awareness on drivers attending the course. Within the body of the research TTC also requested that two mini projects would produce outputs around any access barriers disproportionately experienced by women; Asian women and people with dependent carer responsibilities.

Given that societal understandings of diversity and inclusion evolve, we commit to carry out periodic reviews of the policy, not just annually, to ensure it remains current and to communicate changes to colleagues and their representatives.

If I have a complaint under this policy what should I do?

Customer Complaints

Customer and client complaints are dealt with under the TTC Complaints/Dispute Resolution and Escalation Policy a hardcopy of which is available upon request but can also be accessed via the TTC website: <https://www.thettcgroup.com/complaints/>

TTC promise to deal with all complaints in a timely, fair, and consistent manner.

Complaints are routinely recorded and each is fully investigated. Information is then monitored, collated and evaluated and shared on a quarterly reporting basis with our commissioners in accordance with our ISO:9001 quality assurance procedures.

Colleague Complaints

All staff and contractors should expect to be treated with dignity and respect whilst at work and have an equal responsibility to treat their colleagues similarly. Any colleague 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 colleague is found to have breached the Equality & Diversity Policy, they may be subject to disciplinary action under the Company Disciplinary Procedure, which could result in dismissal.

TTC will not tolerate any discrimination, bullying, harassment or victimisation of colleagues who raise concerns, complain or assist in an investigation. If this occurs it could amount to victimisation. Victimisation will result in disciplinary action and may warrant dismissal.

How do we communicate this policy to those that need to know about it?

All colleagues, including those newly appointed will be made aware of this policy and the responsibilities of both TTC and the individual in promoting diversity. The policy is communicated and made available through the HR management system.

We will ensure that all colleagues, job applicants, and customers have access to this policy either via internal HRIS or the website: www.thettcgroup.com

Subsequent changes or revisions to this policy will be communicated to all colleagues via our approved HR system.

We will take steps to ensure that this policy is included with tender information and contracts for work undertaken for us by external organisations and individuals. All our policies, including those relating to equality and diversity, will be monitored for clarity and plain English. We will arrange for them to be made available in translation and/or in another medium where reasonable.

If you have any questions or comments about this policy please contact:
Mary de Villiers, Head of HR, details below.

A hardcopy of this or any associated policy is available upon request.
Please contact Mary de Villiers; HR Director via e-mail mary.devilliers@ttcuk.com

For more detailed information on **The Equality Act 2010** visit:
<https://www.equalityhumanrights.com/en>