



Our Policies

Diversity & Inclusion Policy



SECTION 1 VISION & SCOPE

1.1 Kelda is committed to providing a diverse and inclusive working environment which reflects its diverse customer base. It is integral to the business delivering against its Strategic Business Objectives and to 'Take responsibility for the water environment for good'. Kelda believe that an innovative and effective Equality and Diversity Strategy is an essential ingredient in maintaining sector leading performance. Kelda promotes equality of opportunity for all its employees and stakeholders.

1.2 Kelda's commitment to Diversity & Inclusion is summarised in the following statement:

“As an organisation Kelda will strive to be as diverse as the society it serves inclusive of all”

1.3 This vision of Diversity and Inclusion will be delivered by following the policy detailed in the following sections.

SECTION 2 DIVERSITY & INCLUSION IN KELDA

2.1 Kelda operates in a diverse community. Our stakeholders include employees, customers, suppliers, contract partners, regulators and shareholders. We aim to recognise and value this diverse stakeholder population through understanding and meeting its different needs. We aim to promote Diversity & Inclusion as an employer and seek to ensure that Diversity & Inclusion principles underpin all areas of our work and service provision.

2.2 Kelda recognises that many people and groups suffer discrimination and face serious barriers when trying to fulfil their true potential. It also recognises that not all forms of unreasonable and unfair discrimination are the subject of legislation. It is the aim of Kelda to take positive steps to redress discrimination, to improve equality of opportunity and to combat any unreasonable or unfair treatment which places people at a disadvantage for any reasons not directly related to their ability to do a job for this organisation or to their eligibility to receive services from us.

2.3 Kelda are committed to a policy of equal opportunities for all and shall adhere to such a policy at all times and will continually monitor all aspects of the business to avoid unlawful or undesirable discrimination. Discrimination against people will mean (but not be limited to) any of the following; on grounds of gender, pregnancy, age, race, colour, nationality, ethnic and national origin, sexuality/sexual orientation, religion and belief, disability, marital status or because they are a member of a trade union, work part time or on a fixed-term contract. This policy will apply equally to all these circumstances.

2.4 Kelda will not tolerate discrimination, harassment, bullying, victimisation or abuse of employees or those connected with the services provided by Kelda. Please refer to the 'Dignity at Work' Policy for more information about this commitment.

2.5 Kelda will always comply with the relevant legislation.

SECTION 3 KELDA CULTURE

3.1 Kelda seeks to create a company environment and culture that is aligned with the Diversity and Inclusion Policy. Therefore, it encourages behaviours and values that will support the policy. The values of the business are:

- We all make a difference
- We can't do this on our own
- We think outside the pipes
- We all pull together
- We plan ahead

These values form part of how the business and our peoples performance is assessed.

SECTION 4 MANAGEMENT APPROACH

4.1 The Chief Executive is responsible for this policy and adherence to it. However, the Kelda Management Team (KMT) are accountable for the Diversity & Inclusion policy being applied in the respective businesses and business units within the Kelda Group. Further, it is the responsibility of individual Directors to implement, monitor and evaluate the Diversity & Inclusion policy in terms of employment practice and service delivery in their individual teams.

4.2 There is an expectation on all employees and stakeholders to respect the Diversity & Inclusion policy and comply with its requirements. This policy will be visible during the recruitment process and all new members of staff will be guided through the policy.

4.3 The “Diversity & Inclusion Statement” will be visible to all staff through HR Online. Colleagues are to be directed to a copy of the whole policy upon appointment and whenever the policy is modified.

4.4 It will be the responsibility of the Kelda Human Resources team to ensure all company policy is up to date and reflects the current Diversity & Inclusion Policy. In particular to support this policy the Conduct & Capability Policy and Dignity at Work Policy will be used to act upon any complaints in relation to discrimination, harassment or bullying involving Kelda's staff or its stakeholders.

4.5 It is expected that when staff represent Kelda they will endeavour to ensure that Diversity & Inclusion principles and practices are adopted.

SECTION 5 TALENT & PEOPLE MANAGEMENT

5.1 Kelda supports a diverse and inclusive working environment. No job applicant or employee will be treated less favourably or disadvantaged by conditions or requirements that cannot be shown to be justifiable within the context of the policy.

5.2 Kelda regards discrimination, harassment, abuse, victimisation or bullying of staff, clients or of others in the course of work as disciplinary offences that could be regarded as gross misconduct. Condoning such behaviour could also be treated as a disciplinary offence. As well as disciplining the perpetrator(s), we will give appropriate support to people who complain of

harassment of themselves or others in accordance with the Dignity at Work and Conduct & Capability policies.

5.3 Selection, recruitment, training, promotion and employment practices will be subject to regular review to ensure that they comply with the Diversity & Inclusion policy. In particular, selection and recruitment procedures will be reviewed no less than annually with the aim of improving Diversity & Inclusion practices.

5.4 Kelda will attempt to accommodate staff requests to work flexibly, whether that be on a part-time basis or an alternative working arrangement, for whatever reason, providing the agreement meets the business's needs. This will be in accordance with the Flexible Working policy.

5.5 Kelda's terms and conditions of employment allow for paternity and partner leave in addition to maternity leave, in accordance with current legislation. Allowance is also made for compassionate and dependant's leave to deal with domestic emergencies. Please see the relevant policies for more information.

5.6 Under the Equality Act 2010 we recognise we have a duty to make reasonable adjustments to accommodate disabled people to enable them to do their job without unnecessary difficulty. We will make adjustments which are reasonable under this Act and our commitments as a 'disability symbol user'.

5.7 We accept our obligation not to discriminate against applicants and employees on the basis of their religion. We also respect the beliefs of all staff. We will try to accommodate employees religious beliefs by:-

- Allowing a place for contemplation during the working day and at the workplace.
- Considering employees' dietary requirements in catering for staff and when providing facilities for staff to eat and store food.
- Allowing staff of particular faiths to take their holidays for religious festivals and other religious observance where this is possible and in accordance with the needs of the business.

5.8 Under the Equality Act, it is unlawful to discriminate on the grounds of gender reassignment. This applies to individuals who:

- intend to undergo gender reassignment
- are in the process of or have undergone gender reassignment.

5.9 The Equality Act ensures Kelda promotes equal pay giving men and women equal rights. Differences in pay can only be justified where the variation between the woman's contract and the man's contract is genuinely due to a material factor, which is not the difference of sex.

5.10 Training or education development to enhance potential within the existing job, arising out of needs identified through 1-1's or from other circumstances will, where appropriate or possible, be provided by Kelda.

5.11 Kelda will aim to take positive action, not including positive discrimination, where previous experience demonstrates that under-representation of any particular group has occurred in recruitment.

5.12 All training opportunities will be published widely to all appropriate employees and not in such a way as to exclude or disproportionately reduce the numbers of applicants from a particular group.

SECTION 6 RECRUITMENT

6.1 To help us monitor the effectiveness of this policy we will request that an equal opportunities monitoring form is completed by all applicants to ensure there is no discrimination in the way we recruit new members of staff.

6.2 Kelda seeks to ensure that its recruitment process is accessible to all sections of the community, in particular those most at social, economic or educational disadvantage.

6.3 Kelda will make public its commitment to combating discriminatory attitudes where these are encountered through its recruitment literature and information available to candidates.

6.4 Kelda will ensure that none of its recruitment policies discriminate directly or indirectly against any group or individual.

6.5 Kelda will attempt to find ways of making our recruitment service accessible to everyone, including people for whom English is not a first language, people with visual or hearing impairments, and people who live in remote rural areas and/or cannot easily travel.

6.6 Kelda will take all reasonable steps to ensure that all its recruitment activities are carried out in premises/rooms which are accessible to all.

6.7 Kelda will operate a variety of means to allow people to contact staff and the Recruitment Team.

SECTION 7 MONITORING AND EVALUATION

7.1 Kelda will regularly evaluate its services and the effectiveness of its Diversity & Inclusion policy, by a variety of means.

7.2 Monitoring will be carried out by Kelda to provide the data for this regular evaluation. Kelda will carry out SAP data validation asking staff to provide personal information about their ethnicity, disability, marital status, age, gender, religion, sexual orientation, religious beliefs and other sensitive information. We will also ask job applicants, for similar information. We will only do this for a specific defined purpose such as collecting statistical data for research or for our own monitoring to evaluate this policy's impact.

7.3 Kelda will be sensitive to groups and individuals and will have due regard for the principles of data protection when seeking information.

SECTION 8 REVIEW OF THE POLICY

8.1 Kelda's commitment to Diversity & Inclusion is an active one. The Kelda 'Diversity & Inclusion Group' will be instrumental in maintaining an active policy and will provide a focal point

within the business to ensuring the policy is being developed and acted upon. The Group will be accountable to KMT for ensuring appropriate review of the policy is undertaken. Therefore, this document will be amended on a regular basis as part of this active commitment.

8.2 Kelda will also seek to keep abreast of new developments in Diversity & Inclusion practice and actively seek information on this issue. The Diversity & Inclusion Group alongside Human Resource colleagues will ensure the relevant developments are reflected in the policy.

SECTION 9 POLICY GOVERNANCE

9.1 This policy is the Kelda Diversity & Inclusion Policy. This Policy supersedes all previous Kelda Group policy. The policy applies to all Kelda Group businesses and employees until such time that an updated policy has been approved by the Chief Executive of Kelda Group.

Version Control

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