 Swallow™ SITE SERVICES	SSS-IMS-POL-010 Annual Equality, Diversity, and Inclusion Policy Statement	Issue/Revision	2.0
		Date	Dec 2024

SWALLOW SITE SERVICES LIMITED

INTEGRATED MANAGEMENT SYSTEM


SSS-IMS-POL-010

ANNUAL EQUALITY, DIVERSITY, AND INCLUSION POLICY STATEMENT

Calendar Year 2025

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Introduction

This is our annual policy statement outlining the steps we take to recognise the importance of fostering a diverse and inclusive workplace that reflects the communities we serve, promoting equal opportunities and outcomes, and eliminating unlawful discrimination.


The statement has been broken down into the following sections:

1. Who we are. Our Business and the Supply Chain
2. The Equality Act 2010
3. Our commitments
4. Ensuring Equality, Diversity & Inclusion in Our Organisation
5. Ensuring Equality, Diversity & Inclusion in the Supply Chain
6. Other relevant Policies and Procedures
7. Endorsement

1. Who we are. Our Business and the Supply Chain

Established in 2001, Swallow Site Services is a trusted provider of building and maintenance services, delivering tailored, professional solutions to businesses across England & Wales. Our expertise spans multiple sectors, offering comprehensive, fully integrated solutions to property maintenance and asset improvement challenges. With over 20 years of experience, we have evolved from our origins as a specialist contractor in railway property, to become a versatile and reliable partner for businesses of all kinds. We understand that property and the Built Environment are incredible assets – they are the foundation of modern life - where we live, work, learn, and play.

Our people and our supply chain play a huge part in providing our services. Our aim is for our workforce to be truly representative of all sections of society and our customers, and for each member of the team to feel respected and able to give their best.

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2. The Equality Act 2010


In line with the Equality Act 2010, this policy's purpose is to:

1. Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
2. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of:
 - 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
3. Oppose and avoid all forms of unlawful discrimination. This includes in:
 - pay and benefits
 - terms and conditions of employment
 - dealing with grievances and discipline
 - dismissal
 - redundancy
 - leave for parents
 - requests for flexible working
 - selection for employment, promotion, training or other developmental opportunities

3. Our commitments

The organisation commits to:

1. Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense
2. Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

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This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public


3. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

4. Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
5. Make decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
6. Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
7. Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy.

Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

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4. Ensuring Equality, Diversity & Inclusion in Our Organisation

1. Communicating and Embedding EDI within the Organisation

- **Strategic Communication Plan:**

We will develop a strategic communication plan to ensure that EDI principles are consistently articulated and understood throughout our organisation. This plan will include:

- **Leadership Commitment:** Our management team will publicly commit to EDI, reinforcing its importance through regular communications.
- **Training and Workshops:** Regular training sessions will be conducted for all employees, focusing on unconscious bias, cultural competency, and the importance of diversity in the workplace.
- **EDI Champions:** We will appoint EDI champions across departments to advocate for inclusive practices, serve as points of contact for EDI-related issues, and ensure ongoing engagement.

- **Embedding EDI Values:**

- **Inclusive Policies:** All organisational policies will be reviewed to ensure they promote inclusivity and are aligned with EDI principles.
- **Performance Metrics:** EDI objectives will be integrated into performance evaluations for all staff, with specific targets for departmental heads to achieve.

2. Using Diversity Monitoring Data to Inform Change


- **Data Collection and Analysis:**

We will implement a robust data collection system to monitor workforce demographics and identify areas of underrepresentation. This will include:

- **Regular Surveys:** Conducting employee surveys and demographic audits to gather data on gender, ethnicity, disability status, and other protected characteristics.
- **Data Analysis:** Utilising analytics tools to assess diversity metrics and track progress over time, identifying trends and areas needing improvement.

- **Informing Change:**

- **Targeted Action Plans:** Based on data analysis, we will develop targeted action plans to address underrepresentation. For instance, where data shows a lack of female representation in technical roles, we will implement mentorship programs aimed at encouraging women to apply for these positions.
- **Feedback Mechanisms:** Establishing regular feedback mechanisms where employees can voice concerns and suggestions related to diversity and inclusion, which will inform our continual improvement efforts.

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3. Widening Access to Employment Opportunities

- **Outreach Initiatives:**

To widen access to employment opportunities among diverse groups, we will:

- **Partnerships with Local Organisations:** Collaborate with local community organisations, job centres, and schools to promote our job openings and provide career guidance to underrepresented groups.
- **Targeted Recruitment Campaigns:** Launch recruitment campaigns specifically targeting diverse populations, including women, ethnic minorities, people with disabilities, and the long-term unemployed.

- **Internship and Apprenticeship Programs:**

- **Diverse Talent Pipelines:** Establish internship and apprenticeship programs aimed at students from underrepresented backgrounds, offering them the opportunity to gain practical experience and develop skills in our industry.
- **Career Fairs and Workshops:** Participate in and host career fairs, workshops, and informational sessions in diverse communities to provide information about career paths in our organisation.

4. Reducing Disproportionality in Recruitment Processes

- **Reviewing Recruitment Practices:**

We will conduct a thorough review of our recruitment processes to identify and eliminate potential biases. This includes:

- **Structured Interviewing:** Implementing structured interviews with standardized questions to ensure all candidates are assessed on the same criteria, reducing subjective bias.
- **Diverse Hiring Panels:** Ensuring that recruitment panels are diverse to bring varied perspectives and reduce bias in decision-making.

- **Blind Recruitment Techniques:**


- **Anonymized Applications:** Utilising anonymised application processes where personal details that could indicate a candidate's background (e.g., name, address) are removed from initial assessments to focus purely on skills and qualifications.

5. Promoting Understanding of the Equality Act 2010

- **Training and Awareness:**

To ensure adherence to the Equality Act 2010 and best practices in EDI:

- **Mandatory Training:** All employees will undergo mandatory training on the Equality Act and its implications for our workplace, including the public sector equality duties.
- **Resource Materials:** We will provide resource materials, such as guides and FAQs, to ensure that all employees understand their rights and responsibilities under the Act.

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- **Encouraging Reporting:**
 - **Safe Reporting Mechanisms:** Establishing clear, safe channels for reporting discrimination or harassment, with assurance that reports will be handled confidentially and without retaliation.

6. Compliance with the Employer's D&I Policy

- **Policy Implementation:**
We will ensure compliance with the Employer's D&I policy by:
 - **Regular Policy Review:** Conducting regular reviews of our D&I policy to ensure it remains relevant and effective in addressing current challenges and opportunities.
 - **Employee Involvement:** Involving employees in the review process to gather insights and foster ownership of the policy.
- **Compliance Monitoring:**
 - **Internal Audits:** Conducting periodic internal audits to assess compliance with our D&I policy and identify areas for improvement.
 - **Reporting Mechanisms:** Establishing clear reporting mechanisms for monitoring adherence to EDI policies, including quarterly reports to senior management.

7. Monitoring, Reporting, and Continual Improvement

- **Monitoring Framework:**
To monitor the effectiveness of our EDI initiatives, we will implement a comprehensive monitoring framework:
 - **Key Performance Indicators (KPIs):** Establishing KPIs related to recruitment, retention, promotion rates, and employee satisfaction, disaggregated by protected characteristics.
 - **Annual Reviews:** Conducting annual reviews of our EDI initiatives, measuring progress against our objectives and identifying areas for improvement.
- **Reporting and Transparency:**
 - **Public Reporting:** Committing to public reporting of our EDI progress, including successes and areas for improvement, to enhance transparency and accountability.
 - **Feedback Loops:** Creating feedback loops where employees can provide input on EDI initiatives, ensuring our strategies remain relevant and effective.
- **Continual Improvement:**
 - **Agile Response to Feedback:** Utilising employee feedback and data analysis to continually adapt and improve our EDI practices.
 - **Best Practice Sharing:** Engaging with industry networks to share best practices and learn from other organisations' experiences in promoting EDI.

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5. Ensuring Equality, Diversity & Inclusion in the Supply Chain

We recognise the vital role that our supply chain plays in promoting Equality, Diversity, and Inclusion (EDI). By aligning our supply chain practices with this policy, we aim to create an inclusive environment that supports diverse suppliers and enhances the overall impact of our projects. This outlines our strategies and initiatives to ensure that EDI requirements are embedded throughout our supply chain.

1. Building Capacity on Best EDI Practices

- **Training and Development:**

To build capacity within our supply chain, we will implement comprehensive training programs that focus on best practices in EDI and the responsibilities under the Equality Act 2010. This will include:

- **Workshops and Seminars:** Organising workshops for suppliers on topics such as unconscious bias, inclusive hiring practices, and the importance of diversity in fostering innovation.
- **Resource Sharing:** Providing suppliers with access to EDI resources, toolkits, and guidelines that outline best practices and legal responsibilities.

- **Capacity-Building Initiatives:**

- **Mentorship Programs:** Pairing smaller or less experienced suppliers with established organisations to share knowledge and resources on implementing effective EDI practices.
- **Networking Opportunities:** Creating forums where suppliers can connect, share experiences, and collaborate on EDI initiatives, fostering a culture of inclusivity.

2. Collecting and Reporting Diversity Data


- **Data Collection Framework:**

We will establish a robust data collection framework to gather diversity data from our suppliers, which will include:

- **Supplier Diversity Assessments:** Requiring suppliers to complete assessments that capture demographic data on their workforce, including gender, ethnicity, disability status, and other protected characteristics.
- **Spend Tracking:** Implementing systems to track and report on spend with local businesses, minority-owned/led businesses, and social enterprises, ensuring transparency and accountability.

- **Reporting Mechanisms:**

- **Regular Reporting:** Providing quarterly and annual reports summarising diversity data, spend analysis, and progress toward EDI goals to both our leadership and stakeholders.
- **Supplier Performance Reviews:** Incorporating diversity metrics into supplier performance reviews to encourage accountability and continuous improvement.

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3. Promoting Adherence to the Equality Act 2010

- **Supplier Contracts and Agreements:**

To promote adherence to the Equality Act 2010 within our supply chain, we will:

- **Include EDI Clauses:** Embed EDI commitments into supplier contracts and agreements, clearly outlining expectations and responsibilities related to diversity and inclusion.
- **Regular Compliance Audits:** Conduct regular audits of suppliers to ensure compliance with EDI requirements and the Equality Act, providing feedback and support for improvement where necessary.

- **Communication of Best Practices:**

- **Sharing Exemplars:** Highlighting best practices and successful case studies within our supply chain to demonstrate the positive impact of EDI and encourage wider adoption.

4. Widening Access to Procurement Opportunities


- **Targeted Procurement Strategies:**

To widen access to procurement opportunities for local businesses, minority-owned/led businesses, and social enterprises, we will:

- **Outreach Programs:** Implement outreach initiatives targeting diverse suppliers to inform them of upcoming procurement opportunities and provide guidance on the bidding process.
- **Simplified Application Processes:** Streamline procurement processes to reduce barriers for small and diverse suppliers, making it easier for them to compete for contracts.

- **Partnerships with Local Organisations:**

- **Collaborating with Community Groups:** Partnering with local chambers of commerce and community organisations to identify and promote diverse suppliers, facilitating connections between them and our procurement team.

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6. Other relevant Policies and Procedures

We have several policies and procedures, all forming part of our Integrated Management System (IMS), that help support this Policy Statement, including:

- Business Ethics Policy (SSS-IMS-POL-006)
- Corporate Social Responsibility Policy (SSS-IMS-POL-035)
- Sustainable Development Policy (SSS-IMS-POL-036)
- Whistleblowing Policy (SSS-IMS-POL-027)
- Dignity at Work Policy (SSS-IMS-POL-013)
- Fairness, Grievance and Disciplinary Policy (SSS-IMS-POL-0018)
- Employee Recruitment/Hiring Procedure (SSS-IMS-PROC-021)
- Communications Procedure (SSS-IMS-PROC-014)
- Worker Consultation Procedure (SSS-IMS-PROC-015)
- Legal Requirements Procedure (SSS-IMS-PROC-005)
- Procurement Procedure (SSS-IMS-PROC-019)
- Control of Subcontractors Procedure (SSS-IMS-PROC-018)
- Evaluation of Compliance Procedure (SSS-IMS-PROC-008)
- Prevention of Illegal Working Policy (SSS-IMS-POL-034)
- Annual Modern Slavery Policy Statement (SSS-IMS-POL-005)

7. Endorsement

This statement was approved by:

- James Stroud, Commercial & Compliance Manager
- Mathew Lee, National Contracts Manager
- John Cronin, National Operations Manager
- Rachel Wilkinson, Offices Manager

Signed by

Karl Lawrence
Managing Director



31st December 2024