

# DIVERSITY & INCLUSION POLICY

**Issued: March 2022**

**Version: 1**

## Policy overview

We're committed to equality of opportunity, diversity and inclusion both in the provision of services to our customers and as an employer. We aim to provide equal opportunities for all by treating people fairly in a manner tailored to their individual needs in line with our business values and objectives.

Our vision - working together to make every journey effortless – will be more likely achieved and our values - Customer-driven, Collaborative, Encouraging, Honest and Bold – can only be embedded into our organisation through effective management of diversity and inclusion.

Our aim is an open and inclusive workplace culture within which everyone feels valued and respects their colleagues. We recognise that a diverse workforce is key to our success by helping us to develop new services, opening up new markets and broadening our customer base. We welcome the input of others, ensuring success through our collective knowledge and experience.

We wish to go beyond compliance with applicable labour and employment law in the area of equality and diversity, setting high standards to meet our varied customer needs. Managing a diverse workforce and ensuring inclusion will remove the barriers that stand in the way of full participation, releasing the creativity that comes from different ideas and experiences.

Embracing diversity and inclusion means recognising everyone has a contribution to make in a work environment free from prejudice and bias where everyone is valued for their differences and encouraged to be innovative and proactive in identifying improvements to our business and practices. By making sure we promote equality, diversity and inclusion we'll be helping everyone to perform at their best and realise their potential, effectively contributing to business performance.

This policy will ensure all colleagues, customers, contractors and those who come into contact with ScotRail are treated fairly, respected and valued, which will ultimately harness potential for all. It will continuously seek improvement around inclusion, equality and diversity and goes beyond minimum compliance with all applicable labour and employment law. Ensuring consistency of purpose, it's based on our values and the following principles:

- All people have the right to be treated with dignity and respect
- We'll overcome prejudice and change any entrenched negative attitudes about equality, diversity and inclusion
- We'll adopt fair and inclusive policies, practices and behaviours throughout our operations and will focus to eliminate all prejudice, discrimination, bullying and harassment
- All colleagues have a personal responsibility for the practical application of this policy in their day-to-day activities and must always support the policy
- Non-compliance with this policy will be treated seriously and will not be tolerated

This policy does not form part of any colleague's contract of employment, and it may be amended at any time.

### **Who does this policy apply to?**

This policy applies to all colleagues (including directors) and any other individuals performing services on ScotRail's behalf (e.g. agents, middlemen, contractors or sub-contractors, joint ventures etc). It applies to all aspects of our relationship with our people and to relations and interactions between colleagues at all levels. We focus on fairness and inclusion, ensuring merit, competence and potential are the basis for our decisions on recruitment and development.

### **1. Legal Framework and Definitions**

We'll always comply with all applicable labour and employment law and will look to go beyond minimum compliance in the areas of equality, diversity and inclusion.

Equality means promoting equal opportunity for everyone. We aim to create a working environment in which all individuals are offered opportunities based on their merit, competence and potential.



Diversity means all the ways we differ. We aim to ensure not only the visible differences such as age, gender, ethnicity and physical appearance are considered in our policies and practices but also the differences that are not outwardly apparent such as thought processes, religion, nationality, sexual orientation, family status, education as well as any perceived differences or due to being associated with someone who has a protected characteristic.

Inclusion means everyone feels involved, respected and valued. We aim to create a working culture where differences are valued and where skills and talents are developed aligned to our values and business objectives.

Regardless of location, the same principles will be adopted across the business. We support the principles of the UN Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, which are:

- Freedom of association and the effective recognition of the right to collective bargaining
- Elimination of all forms of forced or compulsory labour
- Effective abolition of child labour
- Elimination of discrimination in respect of employment and occupation

As a minimum we'll adhere to the following principles in respect of our people and look to go beyond minimum compliance:

- We'll treat all colleagues fairly and honestly, regardless of where they work
- All our people will have agreed terms and conditions in accordance with applicable labour or employment law, reflecting established collective agreements or practice and will be given appropriate job skills training.

## 2. Compliance

Everyone working at ScotRail is responsible for ensuring our values and behaviours are demonstrated through our actions and the way we conduct our business.

**All colleagues** are expected to put this policy into practice. We require a personal commitment from every colleague to treat each other with dignity and respect and set an excellent standard of behaviour for others to follow. Each individual colleague has a responsibility to:

- Recognise the benefits of equality, diversity and inclusion to the business

- Understand this policy and any associated procedures, comply at all times and ensure any colleague reporting to them complies
- Report any instances of discrimination within the workplace and in the way we provide our services or products
- Identify and challenge unacceptable practices and behaviours within the workforce

**The Board** and the **Directors** of the separate business functions have overall responsibility for the effective operation of this policy and for ensuring compliance with all applicable labour and employment law. They're tasked to ensure they create a productive and safe working environment, promoting equality, diversity and inclusion in their workforce.

**Management** must set an appropriate standard of behaviour, lead by example and ensure those they manage adhere to the policy and promote our aims and objectives with regard to diversity, inclusion and equal opportunities. Managers are expected to:

- Promote awareness of equality, diversity and inclusion and champion our values
- Demonstrate and foster a professional and positive approach to the work environment by being inclusive and challenging inappropriate behaviours or practices on a timely basis and in line with HR policies and procedures
- Take the necessary steps to ensure this policy is communicated and followed by existing and new colleagues
- Ensure our partners, stakeholders, contractors and suppliers are aware of this policy and agree to comply
- Develop new practices to promote continuous improvement for diversity, inclusion and equal opportunities for all

**Human Resources** is responsible for ensuring our workforce are aware of our commitment to diversity and inclusion and our aim to be an open, inclusive and diverse organisation. Human Resources is expected to:

- Champion and be custodians of this policy and our values
- Challenge constructively any behaviours which don't promote or demonstrate openness, inclusion and equality
- Coach and support managers to address inappropriate behaviours or practices within their teams in line with HR policies and procedures



- Ensure regular reviews and development of all HR policies and procedures and any amendments or updates remain consistent with the equality, diversity and inclusion principles
- Ensure HR metrics in the areas of diversity and inclusion are analysed to evaluate and action change where required

### 3. Measure, Review and Reinforce

We'll regularly analyse equality and diversity data in line with best practice. Any patterns of under-representation in the workforce where there may be inequality in opportunities in recruitment, promotion or training will be fully investigated and positive steps taken to remove any barriers or discrimination and promote diversity and inclusion.

We're committed to ensuring our operations comply with the requirements of this policy. We aim to ensure compliance via regular audits and reviewing of action plans with the relevant managers and directors.

We'll monitor the impact of reorganisations to check the approach has been fair. We commit to undertake a formal review of this policy every three years or sooner if dictated by operational needs or changes in legislation. Requests for changes to this document must be sent to the Colleague Relations Manager. All requests must provide details of the required changes and the reasons for the changes being requested.

Any colleague found to have breached this policy may be subject to disciplinary action, up to and including summary dismissal.

### 4. Diversity and Inclusion Awareness

All colleagues will be educated in this policy through induction and management training programmes. Everyone, including job applicants and customers will have access to a copy of this policy through our portal/website. Whenever appropriate this policy will feature in relevant training courses, guidance notes, booklets and manuals and will be included with tender information and contracts for work with external organisations and individuals.

Everyone has responsibility for raising awareness of this policy and our values. Every colleague must observe and commit to the aims of this policy across the business.



## 5. Reporting Breaches of the Policy

Any colleague found to have been treated in breach of this policy should raise the matter through the Grievance Procedure or Dignity and Respect Policy. All complaints will be dealt with timeously in accordance with policy and procedure.

Customers who feel they have grounds for complaint may pursue these through the customer complaints procedure. The Company's complaints procedure must be accessible to all.

## 6. Data Protection

We'll comply with relevant principles governing data protection in both Scotland and England.



Review and Revision History

Version	Date	Issued By	Status	Review Due	Comments
1	10/3/22		Final	March 24	Rebranded

