

Equality Diversity and Inclusion Policy

Full policy | POL-24 | Version 2026.10.23

Reviewed and approved 23 October 2026 | Approved by the Managing Director

Make fair decisions and provide a working environment where people are treated with dignity and can raise concerns safely.

1 Purpose and scope

We aim to provide fair access to work and services and a working environment where people are respected. Decisions must be based on relevant requirements, evidence and individual circumstances. Treating everyone identically is not always fair; adjustments or different support may be required.

This policy applies throughout recruitment, engagement, employment, service delivery and the ending of working relationships. It covers site work, home working, travel, training, work events and digital communications. It sets standards for all our services; legal protections depend on the context and the person's status.

2 Standards and legal framework

In Great Britain, the Equality Act 2010 protects age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation in the contexts specified by that Act. Different protections and exceptions apply in different settings. Northern Ireland has separate equality legislation, which must be checked before an affected decision there.

We prohibit unlawful direct or indirect discrimination, harassment, sexual harassment, victimisation and discrimination arising from disability. We also prohibit bullying and degrading conduct whether or not a protected characteristic is involved. Relevant protection can extend to perceived characteristics or association with another person.

A client preference does not justify unlawful discrimination. Do not exclude someone on the basis of an assumption about their age, health, nationality, family responsibilities or other personal characteristic. Any proposed legal exception or occupational requirement must be referred to a director for appropriate advice.

3 Responsibilities

The directors are accountable for applying and reviewing this policy. The Managing Director oversees policy and fair decision records; the Operations Director applies the arrangements in site delivery, contractor engagement and supervision. Managers and contractor leads must brief their teams and act promptly when concerns are raised.

Everyone must behave respectfully, avoid discriminatory decisions and report concerns. Contractors must apply equivalent standards to their teams. Soniclean remains responsible for its own legal duties and cannot transfer them merely by using a contractor.

4 Recruitment work and development

Set objective requirements that are necessary for the work, advertise and assess fairly, and record the reasons for decisions. Offer accessible application and selection arrangements. Ask health or disability questions only where legally permitted and necessary; do not seek information merely out of curiosity.

Allocate work, training and progression using relevant criteria. Review whether practices unintentionally disadvantage a group. Assess flexible-working requests and family or religious needs fairly, within the applicable law and operational requirements. Do not promise that every requested arrangement can be accommodated.

Any lawful positive action must be proportionate and checked by a director. Do not use quotas or prefer a candidate unlawfully. Pay decisions must meet applicable equal-pay and minimum-pay requirements.

5 Reasonable adjustments and dignity

Discuss barriers with the person concerned and consider reasonable adjustments to recruitment, equipment, communication, working arrangements, duties or access. Assess effectiveness, practicality and available resources; record the decision and review whether the adjustment works. A lack of a formal diagnosis must not be used automatically to refuse a discussion.

Protect dignity and privacy when arranging facilities, changing arrangements or resolving conflicting needs. Seek current legal advice where a proposed arrangement raises a specific equality or safeguarding issue. Do not make broad assumptions about a group.

Provide training and instructions in a form people can understand. Keep information about health, disability or personal circumstances restricted to those who need it.

6 Preventing harassment and responding to third parties

Assess foreseeable risks, including lone working, seasonal teams, client premises, power imbalances and messaging groups. Set clear behaviour rules, explain reporting routes and train managers to intervene. Take all reasonable steps to prevent sexual harassment and apply suitable controls to other harassment and bullying risks.

Where a client, resident, supplier or other third party behaves inappropriately, protect the affected person, report the incident and agree action with the client or other responsible party. Do not require someone to tolerate harassment to retain work. Restrictions on access, changes to contact arrangements or ending an engagement may be necessary.

The QMS owner keeps this policy and its preventive controls aligned with changes in the law and reviews whether the controls work in practice.

7 Complaints investigation and outcomes

Anyone may raise a concern privately with either active director. Informal resolution is available where appropriate and chosen freely, but is not required before a formal complaint. Serious concerns must be investigated rather than dismissed as banter or a personality clash.

A director acknowledges the concern promptly, assesses immediate protection and arranges a fair investigation by someone without a conflict. Both parties must have an opportunity to respond. Explain the process, give reasonable updates, consider adjustments and provide the applicable right of accompaniment and appeal.

A review or appeal should be handled by the other director where independent, or by an appropriate external person if both are involved. The outcome is explained to those concerned to the extent lawful and appropriate. Do not promise absolute confidentiality or automatic dismissal. Retaliation against a complainant or witness is prohibited.

8 Records monitoring and review

Keep only the information needed to manage recruitment, adjustments, complaints and fair decisions. Apply the relevant lawful basis and any additional condition for sensitive data. Equality monitoring is not an instruction to collect everyone's religion, health or sexual orientation routinely. Use anonymous or aggregated information where suitable and keep monitoring separate from selection decisions.

Restrict case records and apply the appropriate category in QM-01 section 9.4, with necessary legal holds. Review complaints, recruitment and development decisions, training and adjustments at annual management review. Investigate patterns and assign actions. A public claim about representation or outcomes must be supported by evidence.

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Next review 23 October 2027, or earlier if the law, risks or working arrangements change.