



Leek Building Society

Equality, Diversity & Inclusion Policy

Policy Owner	HR Director
Policy Approver	All Risks Committee
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Policy

The Society is committed to being an equal opportunity employer, ensuring fairness in the way decisions are made, and the promotion of equality, diversity and inclusion during employment.

For our members, we seek to promote a culture where all members and future members are treated as individuals and in a fair and consistent way. We are proud of the diverse cultures, perspectives, and experiences across our heartlands and beyond, and we are committed to creating a positive environment where everyone is treated with dignity and respect.

The Society recognises that having diverse perspectives and thoughts, results in better judgements and better decision-making. Our approach is underpinned by our own values of Members First, Integrity, Collaboration and Responsibility, ensuring that there is a cohesive approach to the way in which we conduct our business. Being a diverse and inclusive employer helps us to fulfil our responsibility to provide a fair and accessible experience for our members and future members.

Our regulators recognise and state their own commitment to diversity and inclusion, as central elements underpinning good culture in firms and are one dimension of how they evaluate the Society's culture and conduct.

Every employee and member is entitled to an environment that promotes dignity, equality and respect for all. We will not tolerate any acts of unlawful or unfair discrimination committed against an employee, contractor, job applicant, visitor, or member because of a protected characteristic.

Environmental, Social & Governance (ESG) Risk

It is critical that the Society takes responsibility for, and shapes the impact it has on the environment, its community, and stakeholders. Putting sustainable and responsible practices at the heart of the business is pivotal to long term success and meeting the expectations of regulators, members, and other stakeholders.

The focus on a firm's performance in respect of environmental impact, labour standards, executive remuneration and broader ethics has never been greater. While long-term corporate success is reliant on avoiding reputational damage and protecting the integrity of the Society, failing to adequately manage these additional risks carries an increased financial and even regulatory risk.

The Society must ensure that its workforce has a diversity of thought, experience and background in order to best serve members and have a positive impact on our local communities. Having a clear policy on the Society's approach to progression, recruitment, working conditions and environment will ensure that our processes are inclusive and will encourage a diverse workforce. The Society must also have a clear process in place to report and take action against discrimination to ensure an inclusive workplace for all.

Equality, Diversity & Inclusion Aims

We recognise the importance that equality legislation has to play in promoting equality and eliminating unlawful discrimination but seek to exceed our legal obligations and to provide an inclusive environment for all. We understand that simply having diversity in our workforce is not enough; we must create an inclusive environment and equality of opportunity, where all employees can contribute their best work, and members receive the best customer experience.

By embracing equality, diversity and inclusion, we mean that talent, contribution, and commitment are key to achieving our aims and we know we can draw on the best of these from all backgrounds.

- We aim to create a Board and workforce that is representative of the regions in which we operate, knowing that embracing diversity amongst our workforce is of value and this is considered alongside the key requirements of relevant knowledge, skill and expertise to enhance the capability of the Society.
- We value and celebrate individuals for their contribution and will embrace diversity in all aspects of our business. We will seek to create a genuinely inclusive workplace which embraces similarities and differences at the individual and group levels for the attainment of the common endeavour.
- We will not tolerate bullying and harassment in any form. In addition, we will endeavour to protect our employees from any form of third party harassment and from adverse treatment because of their association or perception related to any of the protected characteristics.
- We will think and act more broadly than the legislation around not only the protected characteristics, but to those differences around social and educational background, health and wellbeing as an example.

Responsibilities

The HR Director holds overall responsibility for the effective operation of this policy. However, this Policy cannot succeed without the active support of the entire workforce. The implementation of the Policy is therefore a shared responsibility amongst all staff at Leek Building Society. All employees, workers, agency workers and contractors have a duty not to discriminate against each other and not to help anyone else do so.

HR are responsible for monitoring Equal Opportunities data, however, the Distribution Director and Chief Finance Officer are accountable for processes concerned with the assessment of risk of members.

This policy applies to all employees, workers, agency workers, contractors, job applicants, visitors and members. The implementation of its content is the responsibility of every employee.

Board Responsibilities

The Nominations Committee has responsibility for ensuring that appropriate arrangements are in place for the recruitment and selection of suitably qualified persons to act as Directors (both Non-Executive and Executive) of the Society.

The Committee maintains a Board Succession Plan in order to facilitate that recruitment and to ensure that the Board remains fit for purpose in terms of the skills, knowledge, and experience required at any given time. Our Board Succession Plan and development plans will actively encourage participation from individuals from all backgrounds.

When recruiting to the Board, we will ensure that we (and any recruitment partners) positively seek to source candidates from diverse backgrounds and ensure that succession plans, person specifications and selection processes do not directly or indirectly exclude or discriminate. Careful consideration is given to the combined skills, experience and diversity of existing Board members in making new appointments to the Board.

Discrimination

Discrimination is unlawful when it takes place against one of the following protected characteristics:

- age
- disability
- gender re-assignment

- marriage and civil partnership
- pregnancy and maternity
- race
- ethnic or national origin
- religion or belief
- sex
- sexual orientation

Discrimination can take a number of forms:

- Direct discrimination is when someone is treated unfairly because of a protected characteristic. For example, if the business fails to make reasonable adjustments for a disabled person.
- It is also direct discrimination when someone is treated unfairly because they associate with someone with a protected characteristic, or because they are perceived to have a protected characteristic (discrimination by perception). For example, if an employee ostracised a colleague because the colleague has a gay flatmate or because they think the colleague is gay.
- Indirect discrimination is when there are a set of rules or requirements, which disproportionately disadvantages one group when applied in practice, and cannot be justified by the needs of the business.

Our approach

Positive action

For some recruitment and promotion exercises, we may take positive action to address under-representation in our workforce by encouraging applications from people from certain under-represented groups. For example, we may state on advertisements that we particularly welcome applications from certain groups, we may target our advertising towards particular groups, we might hold open days, work shadowing opportunities targeted at particular groups or we might provide training for particular groups to prepare them for promotion. However, we will ultimately make recruitment and promotion decisions on merit and not on the basis of protected characteristics.

Recruitment and selection

We aim to ensure that job requirements and job selection criteria are clear and based only on what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.

We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups, and which are not justified by the demands of the job.

For all jobs, we will draw up a clear and accurate job description and person specification to ensure that we remain focused on what the job involves and the skills, experience and qualifications which are relevant and necessary to do the job. If we hold interviews, we will try to ensure that more than one person conducts them to ensure that we avoid unintentional bias.

We will not ask for personal or irrelevant information on application forms or in interviews. We will focus instead on whether someone has the relevant skills, qualities and experience to do the job.

Positive discrimination with respect to the recruitment and selection of employees is not permitted under law. The only permitted practice whereby protected characteristics can be used to support the selection decision is if there are two candidates of equal scoring. In such an instance, the Society may seek to select the candidate with a background or characteristic that is under-represented within the workforce.

Promotion, training and appraisals

Promotion and training decisions will be made on the basis of merit. We will not unlawfully discriminate against any employee in making promotion or training decisions. We believe all employees should have an equal opportunity to progress and develop. The Society operates a robust succession planning process and due consideration will be given to ensure that individuals named within the plan are as diverse as possible whilst ensuring appropriate level of skills, knowledge and expertise.

We will advertise promotion and transfer opportunities widely, including deputising opportunities and secondments which could lead to permanent promotion. We will try to ensure that training and development opportunities are made known to all relevant employees.

Training needs will be identified through regular reviews and appraisal discussions. We have a formal appraisal system which helps us to ensure that employees are being assessed fairly on the basis of job performance and are not being discriminated against. We will conduct appraisals objectively and measure performance in a transparent and objective way, without prejudice or bias.

Working conditions and terms of employment

We will try to accommodate cultural or religious practices such as prayer requirements where we reasonably can.

We aim to ensure that our terms of employment, benefits, facilities and policies are free from unlawful discrimination. We will review our benefits and facilities regularly to ensure that they are available to all who should have access to them and that there are no unlawful obstacles to accessing them.

We will ensure that decisions made under our internal policies are carried out fairly and without discrimination.

We will continue to carry out a regular audit/review of our pay structures to ensure that they are fair and free from discrimination.

Termination of employment

We will ensure that we avoid discrimination in making decisions about dismissal or redundancy.

Where possible, we will ensure that any manager's decision to dismiss an employee is endorsed by another manager and the HR department. We will encourage leavers to give feedback about their employment in exit interviews.

Disabled employees

We will make reasonable adjustments and engage with appropriate medical professionals to support disabled employees to perform at their best in work. For example, we can provide extra equipment or support, we can re-arrange duties and we can make changes to our premises in appropriate cases. If you think you may have a disability, you are encouraged to tell your manager about this so that we can explore what additional support we could provide.

Member Experience

We will proactively seek to support members to engage with our products and services through accessible formats, personalised experiences and a variety of opportunities to conduct their banking.

Monitoring

We may ask job applicants, and employees / contractors for information about some of their protected characteristics. We do this to help us to:

- establish whether our policies are effective in practice;
- analyse the effect of other policies and practices on different groups;
- highlight possible inequalities, and where appropriate, investigate their underlying causes; and
- take action where we think it is needed to address problems or reduce disparities.

We will only use this information for monitoring purposes. We will protect the confidentiality of the information given to us and will handle it in accordance with our data protection obligations.

Some examples of the type of monitoring we may carry out are as follows:

- how many people with particular characteristics apply for each job, are shortlisted and recruited;
- how many people in the workforce have a particular protected characteristic and the levels within the organisation that they are employed at, their length of service and their resignation rates and patterns;

What to do if you believe you have been discriminated against

If you are an employee you can speak informally with your manager or anyone in HR. If you want to make a more formal complaint, you are encouraged to raise the matter through the relevant internal policies and procedures.

Allegations of potential breaches of this policy will be treated seriously. Employees and contractors who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be considered under our disciplinary procedure.

If you are a member, please report your concerns to the Society's HR Director, Lizzie Hall, via email (lizzie.hall@leekbs.co.uk) or telephone (01538 717074).

What will happen if you act in a discriminatory way?

You must not discriminate against any of our employees, contractors, visitors, members, or suppliers. Equally, we expect our employees, contractors, visitors, customers, members and suppliers not to discriminate against you and we will take appropriate action against anyone found to have done so.

If, after investigation, we decide that an employee has acted in breach of this policy, they may be subject to disciplinary action up to and including dismissal. This applies to the most senior levels of management as well as to all other employees.

Version Control

Date	Version	Author	Description	Approved	Next Review Date
May 2013	1.0	Helen Alcock	Initial version		
October 2014	2.0	Louise Riley	Updated as part of ongoing policy maintenance		
October 2015	3.0	Caron Godfrey	Updated as part of ongoing policy maintenance	Board – issued January 2016	January 2019
March 2019	4.0	Louise Morris	No update required	Head of HR	March 2022
March 2020	5	HR Director	Annual review and combining Diversity and Inclusion policy and Equal Opportunities Policy	ARC	March 2021
March 2021	6.0	HR Director	Annual review	ARC	March 2022
March 2022	7.0	HR Director	Annual review	ARC	March 2023
August 2022	8.0	Head of HR	ESG Update	ARC	March 2023
January 2023	9.0	HR Director	Annual review	ARC	January 2024
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