COMMS LEADERS

DIVERSITY, EQUALITY, INCLUSION AND ANTI-HARASSMENT POLICY

OCTOBER 2026

RECRUIT | TRAIN | CONSULT

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1. Purpose and commitment

Comms Leaders is committed to fair treatment, equal opportunity, dignity, respect and inclusion in its own activities and in the recruitment and training services it provides. We value people's different backgrounds, perspectives, skills and experiences. Discrimination, harassment, sexual harassment, bullying, victimisation and other unacceptable conduct will not be tolerated.
We aim to make our work and processes accessible, objective and respectful; to prevent unlawful conduct before it occurs; to respond promptly and fairly when concerns are raised; and to learn from concerns, risks and outcomes. This policy should be read alongside the company's relevant procedures and contractual terms.

2. Scope

This policy applies to directors, associates, employees and others working for or on behalf of Comms Leaders, to job applicants and to relevant work-related dealings with clients, candidates, suppliers, event / training attendees and other third parties. It covers recruitment and selection, training, coaching, client assignments, meetings, business travel, work-related events, calls, messaging, email, social media and other online or offline work-related settings.
The precise statutory rights and duties that apply can differ according to a person's legal status and the circumstances. Nothing in this policy reduces any right or obligation provided by law or by a contract. Where this policy promises a standard that is broader than the legal minimum, the company intends to follow that standard.

3. Legal framework and protected characteristics

The company will comply with applicable equality and employment legislation, including the Equality Act 2010, as amended, and relevant regulations and guidance in England and Wales. The company will keep this policy under review as the law and official guidance develop.
Under the Equality Act 2010, the nine protected characteristics are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality and ethnic or national origins)
- religion or belief
- sex
- sexual orientation

The company also seeks to treat people fairly in relation to other personal circumstances or characteristics where appropriate. Political beliefs are not a separate protected characteristic under the Equality Act 2010, although particular beliefs may in some circumstances qualify as a protected philosophical belief.

4. Standards of conduct

4.1 Discrimination

Unlawful discrimination is prohibited. Depending on the circumstances, this includes direct and indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, and harassment or victimisation related to a protected characteristic. Decisions must be based on relevant, lawful and consistently applied criteria.

4.2 Harassment and sexual harassment

Harassment related to a protected characteristic can include unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is unwanted conduct of a sexual nature that has that purpose or effect. Conduct may be verbal, non-verbal, physical, written or online. A person's intent, a claim that conduct was a joke, or the fact that others accepted it does not by itself make the conduct acceptable.

Examples can include sexual comments or jokes, intrusive questions, unwanted touching, sexual messages or images, repeated unwanted advances, degrading remarks, slurs, stereotyping, exclusion or offensive material. This list is illustrative, not exhaustive.

4.3 Victimisation, bullying and retaliation

Victimisation—subjecting someone to a detriment because they have carried out, or are believed to have carried out or may carry out, a protected act under equality law—is prohibited. Bullying and other disrespectful conduct may also breach this policy even where it does not meet the legal definition of harassment. No one should be threatened, disadvantaged or treated unfavourably for raising a concern in good faith, supporting another person, or participating in an investigation.

5. Recruitment and selection

- We will seek to attract candidates from the widest appropriate pool and assess applicants against relevant skills, experience, aptitude, qualifications and role requirements.
- Job advertisements and role briefs will use clear, inclusive, job-related language. Age limits or requirements will only be used where lawful and objectively justified or otherwise permitted by law.
- Selection criteria should be defined in advance and applied consistently. Where practicable, structured interviews and documented reasons for decisions should be used.
- We offer a blind-CV service to clients where appropriate and agreed. Removing names or dates may reduce some sources of bias but cannot guarantee that unconscious bias is eliminated; it should form part of a wider fair-selection process.
- We will consider reasonable adjustments for disabled applicants and workers, including accessible application formats, interview arrangements and assessment methods where required.
- Questions about health or disability will only be asked at recruitment stages and for purposes permitted by law. Equality monitoring information, if collected, will be kept separate from selection materials and access restricted.
- We will not knowingly support a client instruction that would require unlawful discrimination. We will explain the concern, seek a lawful alternative and decline or end the assignment if the client persists, subject to contractual and legal obligations.
- Positive action or an occupational requirement will only be used where legally permitted and supported by the relevant facts. It must not be treated as a general permission to prefer or exclude people because of a protected characteristic.

6. Disability, accessibility and reasonable adjustments

We will consider reasonable adjustments for disabled applicants and workers where the law requires them, and will respond constructively to requests for adjustments. Adjustments may include changes to communication, equipment, working arrangements, application methods, interviews, assessments or the working environment. Requests should be handled sensitively and on an individual basis. Information about a person's disability or adjustment needs will only be shared with those who need it to arrange support or meet a legal obligation.

7. Preventing sexual harassment and harassment by third parties

The company will take proactive, proportionate steps to prevent sexual harassment and other unacceptable conduct. From 30 October 2026, the company will work to meet the strengthened legal duty to take all reasonable steps to prevent sexual harassment and the applicable duties concerning harassment by third parties. The company will also take reasonable steps to prevent and respond to other forms of harassment, even where a specific preventative duty does not apply.

Preventative steps will be proportionate to the company's size, work and risks and may include:

- carrying out and recording a risk assessment, including risks arising from client meetings, one-to-one meetings, business travel, work-related social events, power imbalances, remote working and digital communications;
- maintaining clear standards of behaviour for partners, associates and people working with the company;
- providing appropriate induction and refresher training, including specific training for people with management or supervisory responsibilities;
- making reporting routes known and ensuring people know how to seek help promptly;
- considering the safety and support of people who raise concerns, including interim measures where appropriate;
- taking appropriate action with clients or other third parties, which may include setting clear expectations, escalating the issue, changing arrangements, suspending work or ending a relationship where lawful and proportionate;
- reviewing incidents, near misses, feedback and the effectiveness of preventative measures, and updating the risk assessment and action plan.

A policy alone is not enough. The company will maintain evidence of relevant risk assessments, actions, training, communications and reviews. The Policy Lead will coordinate the prevention action plan and report material issues to the Partners.

8. Raising a concern or making a complaint

Anyone covered by this policy who experiences or witnesses conduct of concern is encouraged to report it as soon as reasonably practicable. A person does not need to confront the individual concerned or use a particular legal term before raising a concern. Concerns can be raised with any of the following:

- the designated Policy Lead;
- a Managing Partner or another Partner not involved in the concern;
- the person's usual manager or company contact, if appropriate.

If the concern involves the usual contact, the Policy Lead or a Partner, the person should use an alternative route and contact a Partner who is not implicated. Before publication, the company must insert and test the named contacts and an alternative route. Reports may be made verbally or in writing. Where possible, provide the conduct complained of, dates and locations, people involved, any witnesses, relevant messages or documents, and what support or outcome is sought. A person may raise a concern even if they do not have all this information.

9. Responding to complaints and investigations

- The company will take concerns seriously, respond promptly and assess what immediate steps are needed to protect people and preserve relevant information.
- A suitable person who is not conflicted will consider the concern. Where necessary, an independent investigator or adviser may be appointed.
- The company will use a fair, proportionate process, giving relevant people an opportunity to explain their account and considering available evidence. Confidentiality will be respected as far as reasonably practicable, but information may need to be shared to investigate, take action or meet legal obligations.
- Interim steps may be taken while a concern is considered. These should not penalise the person raising the concern by default and should be kept under review.
- The company will communicate the outcome to the relevant people as far as it can lawfully do so, and will consider appropriate corrective action and steps to prevent recurrence.
- Where the matter concerns an employee or worker, relevant grievance and disciplinary procedures and the Acas Code of Practice will be followed where applicable. This policy does not replace those procedures.
- The company will not tolerate retaliation against someone who raises a concern in good faith or participates in a process. Knowingly false or malicious allegations may be addressed through appropriate procedures, but an unsubstantiated complaint is not, by itself, evidence of bad faith.

10. Responsibilities

All Partners, Associates and people working for or on behalf of the company must:

- read, understand and follow this policy and any related procedures;
- treat others with dignity and respect and avoid discriminatory, harassing or retaliatory conduct;
- complete training required by the company;
- raise concerns about incidents or risks and cooperate honestly with appropriate investigations;
- respect confidentiality and handle personal information appropriately.

The Partners are responsible for approving this policy, providing proportionate resources and ensuring that concerns are addressed. The Policy Lead is responsible for coordinating implementation, training records, risk assessments, the prevention action plan, monitoring and the annual review. Managers and assignment leads must model appropriate conduct, respond to concerns and escalate them promptly.

11. Training, monitoring and records

The company will provide appropriate induction and periodic refresher training on equality, inclusive recruitment, harassment prevention, reporting and responsibilities. Additional training will be provided where risks, incidents or changes in law indicate it is needed.

Where lawful, proportionate and useful, the company may review recruitment outcomes, training completion, complaints and risk-assessment actions to identify patterns and improve practice. Equality monitoring data must be collected and used fairly, securely and transparently, with access restricted and data protection requirements followed. The company will not infer or disclose an individual's protected characteristics unnecessarily.

Records will be retained only for as long as necessary under the company's retention arrangements and applicable data protection law. Access will be limited to people who need the information for a legitimate purpose.

12. Communication, review and consequences

This policy will be made available to Partners and Associates, shared with relevant workers and applicants as appropriate, published on the company's website where suitable, and referenced in client terms or other communications where appropriate. Relevant contractual references should be checked before publication.

The company will review this policy at least annually, and sooner if there is a relevant change in legislation or official guidance, a significant incident, a material change in the company's work or evidence that existing measures are ineffective. Breaches may result in action under applicable contractual, disciplinary or other procedures and may lead to changes in client or supplier relationships, subject to law and contract.