

Inclusion, Diversity, Equity, Accessibility



Together

We are **Clemark Group**,

Registered in England & Wales under **Associate Enterprises Limited** and including all wholly owned subsidiaries. We also trade as Assent, Lorators, Clemark.

Purpose

This policy sets expectations and requirements that foster a respectful, equitable, accessible and anti-racist workplace and service environment across all operations, partnerships and supply chains.

Scope

Applies to all employees, workers, contractors, consultants, agency staff, interns, volunteers, suppliers, and any person interacting with our organisation's services, premises, digital platforms, or events.

Definitions

Inclusion: Creating conditions where everyone feels respected, supported and able to fully participate and contribute.

Diversity: The presence and celebration of differences, including (but not limited to) race, ethnicity, sex, gender identity, sexual orientation, disability, age, religion or belief, socio-economic background, neurodiversity, and lived experience.

Equity: Fair treatment tailored to different needs and circumstances — addressing systemic barriers through targeted resources and support so everyone can thrive.

Accessibility: Designing physical spaces, processes, communications and digital content so they can be used by as many people as possible, including disabled people, with reasonable adjustments made where needed.

Our Commitments

- Treat all individuals fairly and equally and oppose unlawful and unfair discrimination.
- Foster a culture of dignity, inclusion, equity and accessibility for all, with zero tolerance for discrimination, stereotyping, bullying, harassment, victimisation or hate incidents.
- Make reasonable adjustments swiftly for disabled and neurodivergent colleagues and service users; proactively remove barriers in physical, digital and organisational environments.
- Meet or exceed legal and regulatory requirements and align with recognised best-practice standards.
- Design, deliver and evaluate services and products using inclusive, accessible and anti-racist approaches.
- Ethically collect and use anonymised data to monitor outcomes, identify inequities, and inform improvement actions.
- Provide regular training on inclusive behaviours, anti-racism, accessibility and unconscious bias, tailored to roles as appropriate.
- Ensure diverse representation and voice in decision-making, with particular focus on leadership roles.
- Embed IDEA responsibilities into manager objectives, governance processes and supplier contracts (as applicable).

Key Principles

Fairness: Decisions are based on merit, need and context; positive action may be used where lawful to address under-representation.

Accessibility: Barriers are identified and removed; reasonable adjustments and inclusive design are standard practice across physical, digital and communication channels.

Support: Tailored resources, mentorship, accommodations and flexibility for those facing disadvantage or harm.

Accountability: Leaders and all staff are accountable for outcomes and conduct; breaches may lead to disciplinary action.

Transparency & Participation: Open communication, co-design with affected groups, and clear reporting on progress and incidents.

Roles and Responsibilities

Role	Responsibilities
Board / Senior Leadership	Model inclusive, anti-racist behaviour; set strategy and resources; review outcomes; provide governance and oversight.
Heads of Departments	Ensure inclusive recruitment and performance practices; respond to accommodation requests; manage risks; act on reports; build accessible teams and environments.
All Staff & Contractors	Uphold respectful behaviours; challenge discrimination and microaggressions; report concerns; participate in training; contribute to accessibility and safety.
HR / IDEA Champions	Develop policies, tools and training; support managers and staff; monitor data and progress; coordinate audits and improvement plans.
Procurement & Partnerships	Embed IDEA clauses in contracts (where applicable); assess supplier practices; escalate concerns and terminate where necessary.

Inclusive Recruitment, Development and Progression

- Advertise roles widely and use accessible formats; include genuine essential criteria only.
- Use structured interviews and objective scoring; provide adjustments for candidates when requested.
- Monitor diversity at each stage of the talent lifecycle; use lawful positive action to address under-representation.
- Offer equitable development opportunities, sponsorship and succession planning with transparent criteria.

Accessibility & Inclusive Design

- Apply inclusive design of products, services, communications and premises.
- Provide reasonable adjustments including assistive technologies, accessible formats, quiet spaces, flexible work patterns and alternative communication channels.
- Plan and practice emergency procedures inclusive of disabled people and visitors, including Personal Emergency Evacuation Plans (PEEPs), where relevant.

Inclusive Conduct & Zero Tolerance

We are committed to maintaining an environment where everyone is treated with dignity and respect. We operate a zero-tolerance approach to all forms of discrimination, harassment, bullying, and prejudice, whether based on legally protected characteristics or any other personal attribute or identity.

Our commitment includes:

- Actively identifying and removing systemic barriers and inequities in all forms.
- Promoting fairness, inclusion, and accessibility across all organisational activities.
- Ensuring that behaviours, policies, and practices reflect respect for diversity and equity.
- Taking prompt and proportionate action against any conduct that undermines these principles.

This approach applies to all staff, contractors, partners, and anyone interacting with our organisation.

Inclusive Workplace Safety & Emergency Planning

- Conduct regular risk assessments that consider disabled workers, pregnant workers and other at-risk groups.
- Implement PEEPs and building-level evacuation plans where required; keep information secure and share with emergency services when appropriate.
- Ensure alarms, signage and evacuation aids are accessible (where we have the power to do so).

Education & Training

- We aim to provide induction and periodic training opportunities covering inclusion, equality law, accessibility, and unconscious bias.
- Additional training may be offered for specific roles such as managers, recruiters, product teams, customer-facing staff, and partners, where relevant to their responsibilities.

Reporting Concerns & Investigations

We encourage early, informal resolution where appropriate and provide formal routes via grievance and whistleblowing procedures. All complaints will be addressed promptly, impartially and sensitively, with protections against victimisation and confidentiality maintained.

Monitoring, Audit & Continuous Improvement

- Collect voluntary, anonymised workforce and service user data in line with privacy law. Review outcomes to identify inequities.
- Conduct periodic audits of accessibility (digital and physical), recruitment, progression and pay equity; publish summaries where appropriate.
- Review policy at least annually, or sooner following changes in law or incidents. Track actions to closure.

Breaches & Consequences

Breaches of this policy may result in disciplinary action up to and including dismissal and termination of contracts with third parties. Criminal conduct (including hate incidents or hate crimes) may be reported to the police.