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# Equal Opportunity and Diversity

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2026

THINK

# Think FM Solutions Ltd

## Equality, Diversity & Inclusion Policy 2025

### Document control

**Policy owner:** Think FM Solutions Directorate

**Approved by:** Managing Director

**Approval date:** 31 December 2024

**Next review date:** 31 December 2026

### 1. Policy statement

Think FM Solutions Ltd (“the Company”) is committed to providing equality of opportunity, fostering an inclusive working environment, and eliminating unlawful discrimination, harassment, and victimisation in all aspects of its business.

As a facilities management and cleaning services provider with employees working across multiple client sites, we recognise the importance of treating all employees, workers, applicants, contractors, and visitors with dignity and respect, regardless of role, location, or working pattern.

This policy confirms the Company’s commitment to fair treatment, compliance with employment legislation, and the promotion of diversity and inclusion across recruitment, employment, training, and service delivery.

### 2. Scope

This policy applies to:

- All employees and workers (including part-time, fixed-term, and agency workers)
- Job applicants
- Contractors and suppliers working on Company premises or client sites
- Any individual who may be affected by the Company’s activities.

### 3. Legal framework

This policy is underpinned by the following key legislation (as amended):

- Equality Act 2010
- Employment Rights Act 1996
- Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000

- Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Rehabilitation of Offenders Act 1974
- Data Protection Act 2018 and UK GDPR.

The Equality Act 2010 protects individuals from discrimination because of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation.

## 4. Types of unlawful discrimination

### Direct discrimination

Treating a person less favourably because of a protected characteristic.

### Indirect discrimination

Applying a provision, criterion, or practice that disadvantages a particular group and cannot be objectively justified.

### Harassment

Unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

### Failure to make reasonable adjustments

Failing to take reasonable steps to remove disadvantages experienced by disabled individuals.

### Victimisation

Subjecting someone to detriment because they have raised or supported a complaint under this policy.

## 5. Equal opportunities in employment

The Company will avoid unlawful discrimination in all aspects of employment, including:

- Recruitment and selection
- Terms and conditions of employment
- Training and development
- Promotion and progression
- Performance management
- Disciplinary and grievance procedures
- Dismissal and redundancy.

### **Recruitment and selection**

- Selection decisions will be based solely on objective criteria relevant to the role
- Job descriptions and person specifications will be reviewed to ensure they are non-discriminatory
- Wherever practicable, more than one person will be involved in recruitment decisions
- Recruitment records will be retained in line with data protection requirements.

### **Training and development**

- All employees will have access to training appropriate to their role
- Training opportunities will be considered fairly and objectively
- Reasonable adjustments will be made where required.

### **Promotion**

Promotion decisions will be based on merit, skills, experience, and business need, using fair and transparent processes.

### **Discipline**

Breaches of this policy may be treated as misconduct or gross misconduct and addressed under the Company's Disciplinary Procedure.

## **6. Dignity at work**

The Company is committed to providing a working environment free from bullying and harassment.

This policy should be read in conjunction with the Company's:

- Dignity at Work / Anti-Bullying Policy
- Sexual Harassment Policy

Any form of bullying, harassment, or victimisation will not be tolerated.

## 7. Responsibilities

### Managing Director

- Overall accountability for equality, diversity, and inclusion.

### Directors and senior managers

- Ensuring this policy is implemented across all sites and contracts.

### Line managers and supervisors

- Applying this policy fairly and consistently
- Addressing concerns promptly and sensitively
- Escalating issues to HR where appropriate.

### Employees

- Treating colleagues, clients, and others with dignity and respect
- Complying with this policy and related procedures
- Reporting concerns or incidents appropriately.

## 8. Grievances and complaints

Employees who believe they have been subjected to discrimination, harassment, or victimisation should raise the matter using the Company's Grievance Procedure.

Complaints will be:

- Taken seriously
- Investigated promptly and fairly
- Handled confidentially where possible.

No employee will be subjected to detriment for raising a concern in good faith.

## 9. Monitoring and review

The Company will monitor the effectiveness of this policy through:

- Review of complaints and grievance data

- Recruitment and workforce information (where lawfully permitted)
- Audit and management review processes.

This policy will be reviewed annually and updated in line with changes in legislation or business needs.

## 10. Criminal record disclosure

Where roles require Disclosure and Barring Service (DBS) checks, these will be carried out in accordance with:

- Rehabilitation of Offenders Act 1974
- DBS Code of Practice
- Data Protection Act 2018.

Disclosure information will be:

- Used only for the purpose for which it was obtained
- Stored securely with restricted access
- Retained for no longer than six months unless legally required
- Destroyed securely after the retention period.

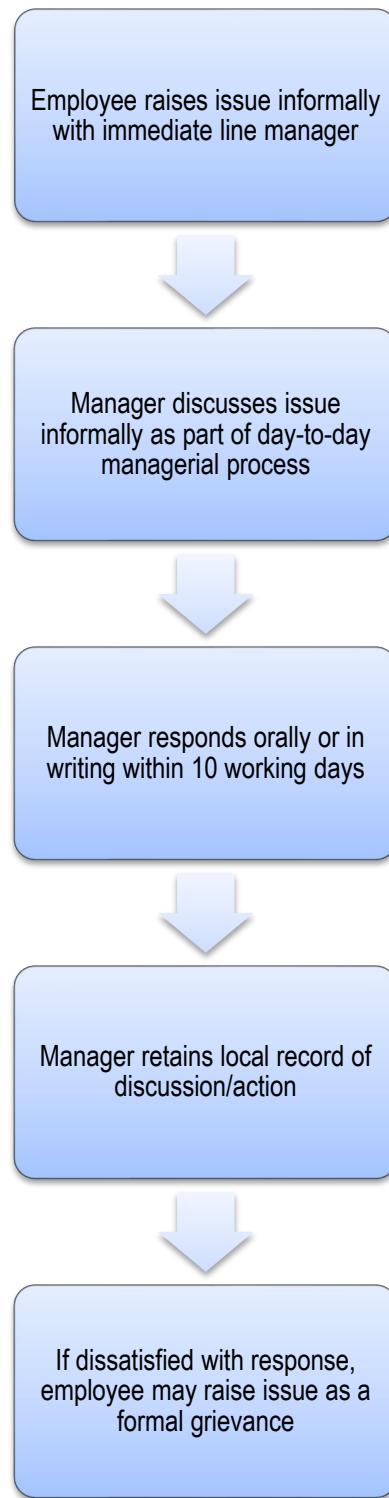
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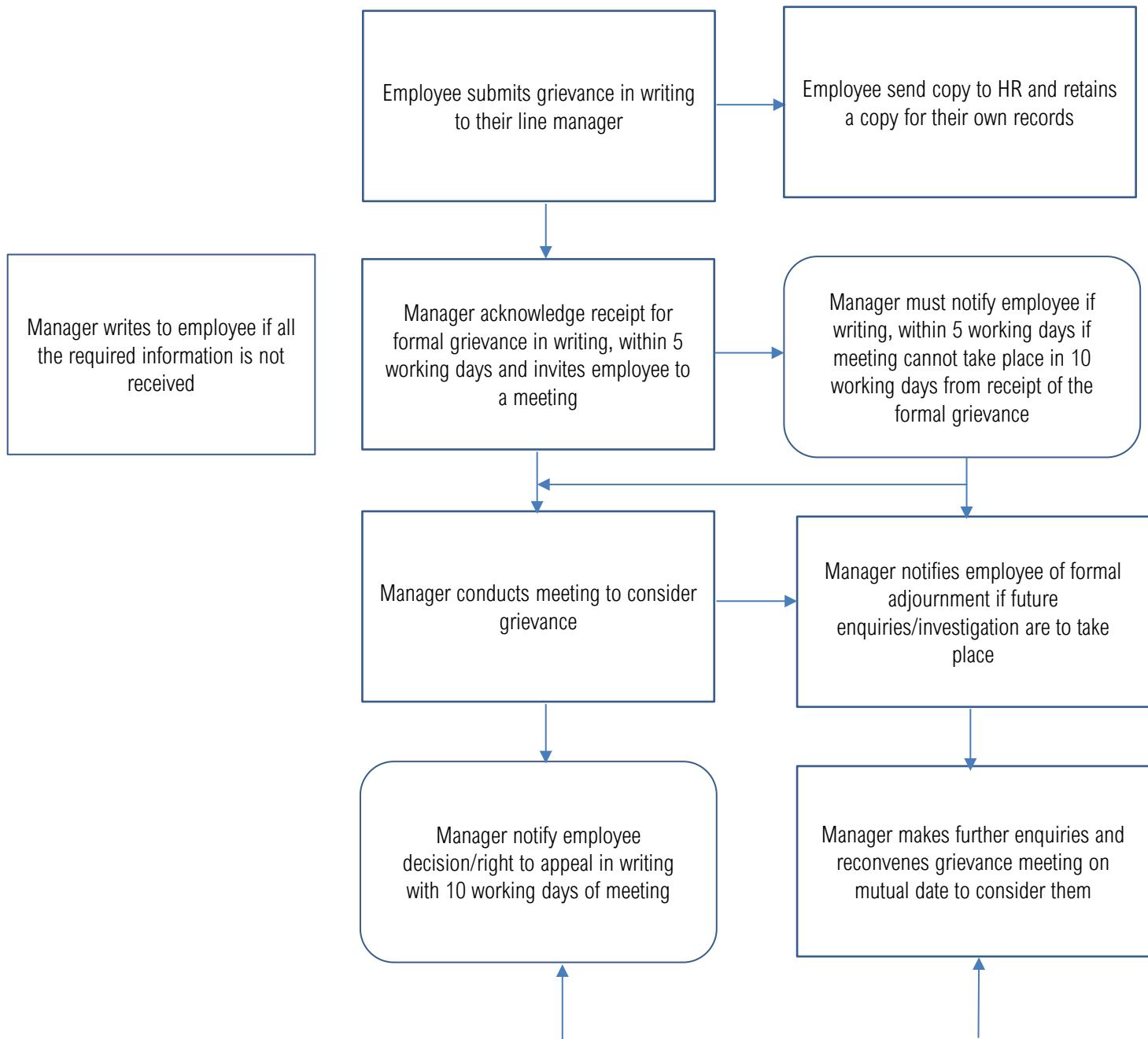
Managing Director

Think FM Solutions Ltd

## Informal Approach Flowchart

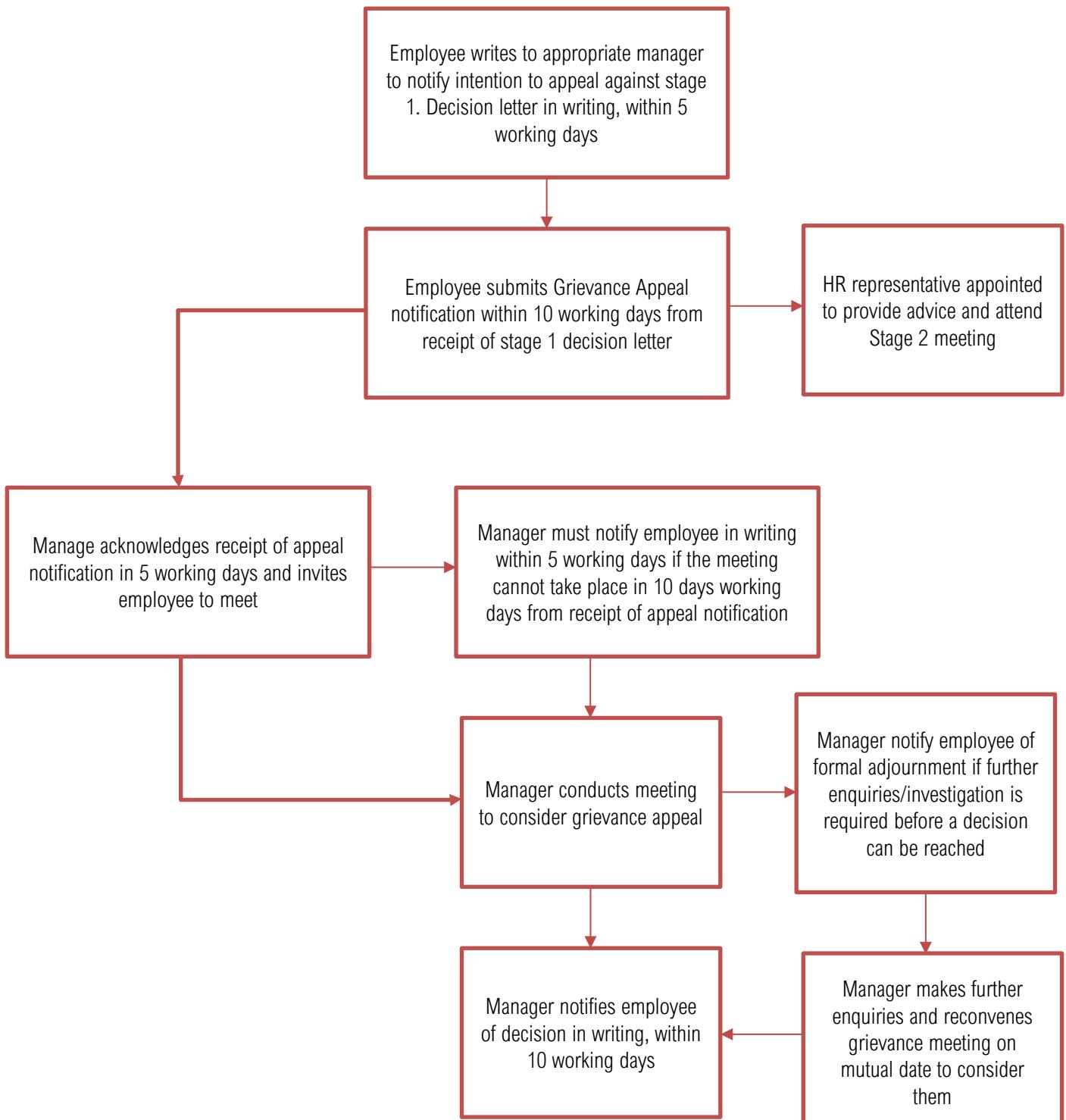


## Formal Grievance Procedure Flowchart Stage 1 Raising Formal Grievance



## Formal Grievance Procedure Flowchart

### Stage 2 Appeals Procedure against a decision at stage one



# CRIMINAL RECORD DISCLOSURE POLICY

## 1. GENERAL PRINCIPLES

Think FM is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults, on all our learning programmes. As such checks will be made on all new staff that will work with or come into contact with children, young people and vulnerable adults through a role in the company.

TFM uses both the Criminal Records Bureau (CRB) and Disclosure Scotland to make checks to help assess the suitability of applicants for positions of trust. This will ensure that we comply with LSC and other funding body contractual requirements, the Protection of Children Act 1999 and the Protection of Vulnerable Adults Act.

TFM abides by the CRB and Disclosure Scotland Codes of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

## 2. STORAGE AND ACCESS

A central record of checks carried out will be kept by the HR department. Disclosure information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

## 3. HANDLING

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties.

We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

## 4. USAGE

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

## 5. RETENTION

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. The maximum period of retention is six months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult the relevant Disclosure Service about this and will give full consideration to the data protection and human rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

## 6. DISPOSAL

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in a secure place as identified above.

We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.

We will keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.