WIDERARC LTD

EQUALITY, DIVERSITY AND INCLUSION POLICY

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1. Purpose, Status and Scope

1.1 Purpose of this Policy

This Policy sets out the equality, diversity and inclusion (EDI) standards applied by WiderArc Ltd (WiderArc) across its business operations and its consultancy, organisational development, leadership, culture change, training, facilitation, coaching, research, consultation and stakeholder-engagement services. Its purpose is to support fair treatment, remove avoidable barriers, prevent unlawful discrimination and harassment, and enable meaningful participation by people with different backgrounds, identities, experiences and needs.

1.2 Status and Application

This is an internal governance and operational policy. It may also be shared with Clients, procurement bodies, Associate Consultants and delivery partners as evidence of WiderArc's arrangements. Unless expressly incorporated into an Agreement, it does not create a separate contract, vary an existing Agreement or transfer a statutory duty between WiderArc and a Client. Mandatory law and binding regulatory requirements prevail where applicable.

The Policy applies, according to role and legal status, to WiderArc directors, employees, workers, applicants, temporary personnel, Associate Consultants, subcontractors, delivery partners, volunteers and other authorised persons supporting the Services. It also informs WiderArc's dealings with Clients, prospective Clients, Participants, suppliers, visitors and members of the public affected by its work.

1.3 Geographical and Sector Scope

This Policy is designed primarily for work in Great Britain. Where Services are delivered in Northern Ireland or outside Great Britain, WiderArc will identify any additional or different local equality, employment or service-delivery requirements during project planning. Sector-specific requirements, including those applying to public authorities, NHS bodies, education providers, local government and other regulated organisations, will be addressed where relevant to the assignment.

2. Legal Framework and Related Documents

2.1 Principal Legal Framework

The Equality Act 2010 is the principal equality law applying to WiderArc's work in Great Britain. It prohibits specified forms of discrimination, harassment and victimisation in employment and in services and imposes duties relating to reasonable adjustments for disabled people. WiderArc will comply with applicable equality, employment, data-protection and human-rights requirements, including the statutory duty to prevent sexual harassment and relevant amendments brought into force from time to time, and will have regard to current Equality and Human Rights Commission (EHRC) Codes and guidance and relevant ACAS guidance.

2.2 Public Authorities and Public Functions

Public-authority Clients remain responsible for complying with the Public Sector Equality Duty and any applicable specific duties. WiderArc may support evidence gathering, consultation, analysis, equality impact work or implementation planning, but does not assume a Client's statutory decision-making responsibility merely by providing consultancy services. If WiderArc itself carries out a function of a public nature, it will assess and comply with any equality duties that apply to that function.

2.3 Relationship with WiderArc's Document Suite

References in this Policy to other WiderArc documents are by clause heading or topic rather than clause number so that future renumbering does not make those references inaccurate. This Policy should be read with the following documents where relevant:

- WiderArc's Terms and Conditions and the applicable Statement of Work, particularly the Statement of Work; Equality, Diversity and Inclusion; Public Sector Duty; Accessibility and Reasonable Adjustments; Professional Standards; Safeguarding and Participant Welfare; Recording, Photography and Transcription; Complaints Procedure; Records and Retention; and Information Security, System Access and Automated Tools provisions.
- The Safeguarding Policy, particularly its Equality, Accessibility and Trauma-Informed Practice; Safe Delivery Arrangements; Responding, Reporting and Emergency Action; Protection from Retaliation; Information Sharing, Confidentiality and Data Protection;

Safeguarding Records, Retention and Disposal; and Safeguarding Complaints provisions.
- The Health and Safety Policy, particularly its provisions on accessible and safe delivery, participant safety, disability and individual risk, work-related stress, violence and harassment, reporting and records.
- The Privacy Policy and GDPR and Data Protection Policy, particularly their provisions on Special Category Personal Data, data minimisation, Data Protection Impact Assessments, information security, Personal Data Breaches, retention and automated tools.
- The applicable Data Processing Agreement and project-specific Processing Particulars where WiderArc Processes Client Personal Data as Processor.
- The Dispute Resolution Policy where an unresolved contractual or commercial dispute arises.

This Policy does not alter the contractual hierarchy. Contractual precedence is governed by the Order of Precedence provisions of the Terms and Conditions and, where applicable, the Data Processing Agreement. Equality, employment, safeguarding, health and safety, data protection, complaints and dispute procedures may operate in parallel. Urgent protective action must not be delayed while the appropriate procedural route is being confirmed.

3. Definitions and Core Principles

3.1 Key Definitions

Capitalised terms not defined in this Policy have the meanings given in WiderArc's Terms and Conditions or applicable data protection documents. In this Policy, Associate Consultant means an independent professional engaged by WiderArc to provide or support Services; Participant means a person attending, contributing to or affected by an activity delivered as part of the Services; and WiderArc Personnel means directors, employees, workers and other persons working for or on behalf of WiderArc within the scope of this Policy.

3.2 Protected Characteristics

The protected characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The legal protection attached to a characteristic varies according to context. WiderArc may also adopt inclusive practices concerning factors such as socio-economic background, caring responsibilities, neurodiversity, language, accent and working pattern without describing them as protected characteristics where the law does not do so.

3.3 EDI Principles

Equality means fair access, treatment and opportunity. Equity means recognising that proportionate support or removal of barriers may be needed to achieve fair participation. Diversity means recognising different identities, backgrounds, experiences and perspectives. Inclusion means creating conditions in which people can participate, contribute, raise concerns and be treated with dignity and respect.

WiderArc will act lawfully, fairly and proportionately; use relevant evidence and objective criteria; avoid stereotyping and tokenism; respect privacy and individual choice; consider intersectional or cumulative disadvantage where relevant; and seek practical improvement rather than relying only on statements of intent. WiderArc may use lawful and proportionate positive action where there is a proper evidential basis and the statutory conditions are met; it will not use unlawful positive discrimination.

4. Governance and Responsibilities

4.1 Accountability and Oversight

WiderArc's directors retain overall accountability for this Policy. A director or other appropriately nominated person will oversee implementation, material EDI risks, significant concerns, proportionate training and review. Responsibilities may be combined with safeguarding, privacy, health and safety or project roles where this is appropriate to the size and structure of the business.

4.2 Project Leads and WiderArc Personnel

Project leads must identify material accessibility, participation, representation, safety, confidentiality and EDI considerations during planning; confirm responsibilities with the Client; brief relevant WiderArc Personnel; and ensure that material arrangements are reflected in the Statement of Work, delivery plan or participant information. WiderArc Personnel must treat others with dignity, use professional and inclusive communication, support reasonable adjustments within their role, protect confidential information and raise material concerns through the appropriate route.

4.3 Clients, Associates and Third Parties

WiderArc expects Clients, Associate Consultants, subcontractors, suppliers and delivery partners to support a safe and inclusive working environment. Where conduct or arrangements create a material EDI, safety or legal concern, WiderArc may request corrective action, change delivery arrangements, remove or replace personnel, pause an activity or exercise contractual rights where this is lawful and proportionate.

5. Fair Employment, Recruitment and Engagement

5.1 Fair and Inclusive Decisions

Recruitment, selection, engagement, allocation of work, pay, fees, training, development, performance, promotion, renewal and termination decisions will be based on lawful, relevant and proportionate criteria. Role and assignment requirements should be genuinely necessary and expressed clearly. Advertising, sourcing, selection criteria and interview questions should avoid unnecessary barriers and relate to competence, experience, conduct, availability and project requirements.

Questions or records concerning health, disability or criminal history must be used only where lawful, necessary and relevant to the particular decision or adjustment. WiderArc will not make assumptions about capability because of identity, background, health, caring responsibilities or working pattern.

5.2 Reasonable Adjustments and Access to Opportunity

Applicants and WiderArc Personnel may request reasonable adjustments to recruitment, communication, equipment, working methods, hours, travel, meetings, training or other arrangements. WiderArc will discuss functional needs promptly and avoid requesting unnecessary medical detail. Pay, fees, contractual terms and access to opportunities will be determined through objective and explainable factors relevant to the role or assignment, and genuine concerns about equal treatment may be raised without retaliation.

5.3 Family-Related and Flexible Arrangements

WiderArc will apply statutory family-related, pregnancy, maternity, paternity, adoption, caring, disability, religion or belief and flexible-working rights and requests as applicable to the individual's legal status. Operational requirements may be considered, but decisions must not be based on stereotypes or applied in a way that creates unjustified disadvantage. Nothing in this Policy changes the contractual, employment or tax status of an Associate Consultant.

6. Inclusive Consultancy and Accessible Service Delivery

6.1 Inclusive Design and Accessibility

WiderArc will take reasonable steps to design Services, Deliverables, research, consultation and learning activities so that people can participate meaningfully. Planning should consider, where relevant, disability, neurodiversity, language and literacy, sensory needs, digital access, cultural context, timing, caring responsibilities, confidentiality, safety and the possibility that some topics may be sensitive or distressing.

WiderArc and the Client will identify practical responsibility for accessibility and reasonable-adjustment arrangements during project planning. This allocation does not transfer or limit a legal duty owed by either Party. WiderArc will not charge an individual for a reasonable adjustment for which WiderArc is legally responsible. Material scope, specialist provision, third-party cost or timetable implications should be agreed with the Client in writing.

6.2 Materials, Communication and Digital Delivery

Materials should use clear structure, readable formatting, meaningful headings and accessible electronic formats where reasonably practicable. Facilitators should explain participation options, breaks, conduct expectations and ways to request support or raise a concern. Digital platforms and tools should be selected and configured with reasonable regard to accessibility, privacy, security and unequal digital access.

6.3 Research, Consultation and Representation

Sampling, recruitment, questions, facilitation, analysis and reporting should be designed to reduce avoidable exclusion and bias. WiderArc will not imply that a small or self-selecting group represents an entire community. Findings should distinguish evidence, limitations and professional judgement and should avoid language or presentation that reinforces stereotypes or creates unnecessary re-identification risk.

6.4 Client Responsibilities and Professional Independence

Clients remain responsible for their own legal duties, employment decisions, public-law functions and implementation of recommendations. WiderArc will provide independent professional work within the agreed scope and will not knowingly deliver work intended to justify unlawful discrimination, conceal material inequality or predetermine an evidence-gathering exercise. Recording, photography, transcription, case studies, testimonials and publicity must follow the Recording, Photography and Transcription provisions of the Terms and Conditions and the applicable safeguarding and data-protection requirements.

7. Dignity, Respect and Harassment Prevention

7.1 Unacceptable Conduct

WiderArc will not tolerate unlawful direct or indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment, sexual harassment or victimisation. Bullying, intimidation, hostile or degrading conduct, identity-based abuse, exclusionary behaviour and retaliation may breach this Policy even where the legal threshold for an Equality Act claim is not established.

7.2 Preventing Harassment

WiderArc will take the preventative steps required by law and proportionate to its size, sector and work. These may include assessing foreseeable risks, setting and communicating standards of conduct, providing practical reporting routes, briefing or training relevant personnel, responding to warning signs and reviewing incidents and patterns. Risk assessment will consider conduct by Clients, Participants, suppliers, contractors and other third parties as well as conduct between colleagues.

7.3 Conduct During Services

Facilitators may set or reinforce ground rules, redirect discussion, challenge discriminatory language, pause an activity, require conduct to stop, ask the Client to intervene, remove a person where authorised, or end or relocate a session where necessary for safety, dignity or effective delivery. Action should be proportionate and should not suppress lawful disagreement merely because a subject is difficult or contested.

7.4 Immediate Risk and Protection from Retaliation

Discriminatory abuse, harassment, threats, stalking, severe distress or exploitation may also create safeguarding or health and safety concerns. The relevant specialist policies apply in parallel, and immediate emergency or protective action takes priority over ordinary complaint handling. WiderArc will not subject, or knowingly permit a person acting on its behalf to subject, anyone to retaliation or detrimental treatment because they raised or supported a concern in good faith, requested an adjustment or exercised a legal right.

8. EDI Data, Research and Automated Tools

8.1 Lawful and Proportionate Data Use

Equality monitoring, demographic surveys, adjustment information, health information and accounts of discrimination may contain Personal Data and Special Category Personal Data. WiderArc will collect only what is reasonably necessary for a defined purpose, identify its Controller or Processor role, apply the appropriate lawful basis and any additional condition required for sensitive data, restrict access, use proportionate retention and security controls, and complete or assist with a Data Protection Impact Assessment where required.

Where WiderArc acts as Controller, the Privacy Policy and GDPR and Data Protection Policy apply. Where WiderArc acts as Processor, it will follow the applicable Data Processing Agreement, project-specific Processing Particulars and lawful documented Client instructions. These documents govern detailed data-protection requirements and are not repeated in this Policy.

8.2 Monitoring, Confidentiality and Small Numbers

EDI monitoring must have a defined purpose and should not collect sensitive information merely because it is available. Reporting should use aggregation, pseudonymisation, suppression or combination of small-number groups where reasonably necessary to reduce re-identification risk. WiderArc will not promise absolute anonymity where identification remains reasonably possible. Results should be interpreted with appropriate regard to response rates, missing data, sample size, intersectionality, context and the distinction between correlation and causation.

8.3 Artificial Intelligence and Automated Tools

Use of AI or automated tools must follow the Artificial Intelligence and Automated Tools provisions of the GDPR and Data Protection Policy and the Information Security, System Access and Automated Tools provisions of the Terms and Conditions. Client Personal Data, Special Category Personal Data, safeguarding information or other materially sensitive information must not be entered into a public or unapproved AI system. Outputs that may materially affect a person must receive meaningful human review proportionate to the risk. WiderArc's policy is not to make significant decisions about individuals solely by automated Processing except through a specifically approved and lawful process with the required safeguards.

9. Raising Concerns and Corrective Action

9.1 Raising a Concern

An EDI concern may be raised with the relevant project lead, the person overseeing this Policy, a WiderArc director or at enquiries@widerarc.co.uk. WiderArc will make reasonable adjustments to the reporting process and may accept a concern verbally where a written route would create a material barrier, with a proportionate written record made afterwards where practicable.

9.2 Appropriate Procedure

Workforce conduct or employment matters will be handled through the applicable employment, engagement, grievance or disciplinary route. Client or Participant complaints about service quality or administration will follow the Complaints Procedure in WiderArc's Terms and Conditions. Unresolved contractual or commercial disputes may be managed under the Dispute Resolution Policy. Data-protection concerns will follow the Privacy Policy or GDPR and Data Protection Policy; safeguarding and health and safety concerns will follow the relevant specialist policy. Mixed matters may be coordinated across procedures, and urgent protective action must not wait for a complaint or commercial disagreement to be resolved.

9.3 Review, Outcomes and Learning

Concerns will be assessed and reviewed fairly, promptly and proportionately under the applicable procedure, with conflicts of interest managed where practicable. Interim measures may be used to protect people, information or service delivery without predetermining the outcome. Appropriate outcomes may include explanation, apology, reasonable adjustment, correction of a process or Deliverable, training or briefing, change to working or delivery arrangements, contractual or disciplinary action, removal from an assignment, referral to a Client or competent authority, or no further action. WiderArc will identify relevant lessons and track material corrective actions without disclosing more Personal Data than necessary.

10. Training, Assurance, Review and Approval

10.1 Training and Awareness

WiderArc Personnel will receive induction, briefing or training proportionate to their role and the risks of their work. Relevant content may include Equality Act duties, reasonable adjustments, inclusive facilitation, harassment prevention, responding to concerns, safeguarding, accessible communication, bias and data protection. Project-specific briefings will be used where an assignment creates additional risk or Client requirements.

10.2 Monitoring and Assurance

WiderArc may review recruitment and engagement decisions, adjustments, complaints, participant feedback, accessibility issues, material incidents and corrective actions where this is useful for assurance or improvement. Monitoring will remain proportionate to the size and risk profile of the business and will not create unnecessary collection of sensitive Personal Data.

10.3 Breaches of this Policy

A breach of this Policy may lead to advice, supervision, training, restriction of duties or access, removal from an assignment, disciplinary or contractual action, termination of an engagement, or referral to a Client, regulator or other authority where lawful and appropriate. Action will reflect the person's legal status and the seriousness, impact, repetition, intent, cooperation and mitigation relevant to the matter.

10.4 Review, Approval and Availability

This Policy will be reviewed at least annually and sooner following a material legal or regulatory change, a serious incident, evidence of recurring barriers, a significant change in Services or evidence that an existing control is ineffective. Material amendments require approval by a WiderArc director. The current version will be made available to WiderArc Personnel and may be provided to Clients, prospective Clients, Associate Consultants, procurement bodies and other stakeholders. Requests for an accessible version should be sent to enquiries@widerarc.co.uk.

Policy Approval

Approved by	Director, WiderArc Ltd
Name	Corey Garrett
Signature	Corey Garrett
Approval date	27/08/2026