HALLMARK SECURITY

HALLMARK SECURITY LTD: EQUALITY AND DIVERSITY POLICY

Equal treatment of staff, applicants, clients and the public under the Equality Act 2010.

Document reference	POL1	**Version**	03
Issue date	18/11/2026	**Review date**	18/11/2027
Owner	Managing Director, Hallmark Security Ltd	**Approver**	Ian Ross, Managing Director
Supersedes	POL1 Equality and Diversity Policy Version 02 (issued 17/11/2026).		
Related documents	QC.09 Employee Handbook (Equality, Diversity and Inclusion; Grievance; Appeals; Disciplinary; Whistleblowing chapters); POL3 Sexual Harassment Policy v03; POL37 Anti-Bullying and Harassment Policy v01; QC.73 Harassment and Bullying Risk Assessment v02; POL11 Whistle Blowing Policy; POL34 Safeguarding Policy; FP.03 Recruit & Screening Process (BS 7858); POL12 Right to Work and Illegal Working Policy; POL13 Occupational Health and Mental Health Policy; CP.20 Records Retention Schedule; Privacy Notice.		

Approval	Approved by Ian Ross, Managing Director, 18/11/2026

1. Policy statement

Hallmark Security Ltd is a small family company. We supply security officers, mobile patrols and K9 handlers to clients, many of them councils and other public bodies. We will treat everyone who works for us, applies to us, or meets our officers on site fairly and with dignity. We will not discriminate unlawfully, and we will not tolerate harassment or victimisation.

The Managing Director recognises the link between equality and quality. Every member of staff is responsible for preventing unfair discrimination within their control. Discrimination, harassment or victimisation by anyone working for us is a disciplinary offence and, if serious, may be gross misconduct leading to dismissal (QC.09).

2. Who and what this Policy covers

This Policy applies to directors, office and control-room staff, security officers, mobile patrol officers and K9 handlers, whether permanent, temporary, zero-hours or casual, and to agency and subcontracted personnel working on our behalf. It covers recruitment, screening, terms and pay, rostering and site allocation, training, promotion, discipline, grievance and dismissal, and how our people treat clients, visitors and members of the public. It applies at Head Office, on client sites, on patrol, in vehicles, at work events and online, including work WhatsApp groups and social media. This Policy is written for Hallmark's work in England and Wales.

3. The law: the Equality Act 2010

The Equality Act 2010 protects people from discrimination because of nine **protected characteristics** (section 4):

age (s.5)	disability (s.6)	gender reassignment (s.7)
marriage and civil partnership (s.8)	pregnancy and maternity (ss.17-18)	race, including colour, nationality and ethnic or national origins (s.9)
religion or belief (s.10)	sex (s.11)	sexual orientation (s.12)

The following are unlawful, and are not permitted at Hallmark:

- **Direct discrimination (s.13):** treating someone less favourably because of a protected characteristic, including one they are thought to have or one held by someone they are associated with, such as a disabled child.
- **Indirect discrimination (s.19):** applying a rule, criterion or practice to everyone that puts people who share a protected characteristic at a particular disadvantage, unless it is a proportionate means of achieving a legitimate aim. For example, a fixed shift pattern or a uniform rule that cannot be justified.
- **Discrimination arising from disability (s.15):** treating a disabled person unfavourably because of something arising from their disability, such as disability-related absence, unless it can be justified.
- **Failure to make reasonable adjustments (ss.20-21):** see section 5.
- **Harassment (s.26):** unwanted conduct related to a relevant protected characteristic (age, disability, gender reassignment, race, religion or belief, sex or sexual orientation), or of a sexual nature, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Statutory harassment under s.26 does not apply to marriage and civil partnership, or to pregnancy and maternity; conduct related to pregnancy and maternity may still be sex discrimination or pregnancy and maternity discrimination (s.18). Hallmark will not tolerate harassment related to any protected characteristic.
- **Victimisation (s.27):** treating someone badly because they have complained about discrimination, supported someone else's complaint, given evidence, or are thought to be about to do so.
- Pregnancy and maternity discrimination at work (s.18), and instructing, causing, inducing or helping someone else to discriminate (ss.111-112).

Employees can be held personally liable for discrimination they carry out in the course of their work (s.110). The Company is liable for its employees' acts unless it took all reasonable steps to prevent them (s.109).

4. Harassment, including sexual harassment and harassment by third parties

An employer must not harass its employees or job applicants (s.40(1)). Since 30 October 2026 an employer must also not permit a third party, such as a client, client's staff, contractor, visitor or member of the public, to harass its employees in the course of their work, and is liable if it failed to take all reasonable steps to prevent it (s.40(1A) to (1C), inserted by the Employment Rights Act 2025, section 21).

An employer must take all reasonable steps to prevent sexual harassment of its employees in the course of their employment (s.40A). This duty has applied since 26 October 2024 and was strengthened to "all reasonable steps" from 30 October 2026 (Employment Rights Act 2025, section 20). Our **Sexual Harassment Policy (POL3 v03)** and **Anti-Bullying and Harassment Policy (POL37 v01)** set out how harassment is prevented, reported and investigated, and the risks are assessed on **QC.73 Harassment and Bullying Risk Assessment v02**, which is reviewed at least yearly and after any incident.

Hallmark will not use any agreement or confidentiality clause to stop a worker from reporting harassment or discrimination, or the way we responded to it, to the authorities or advisers.

5. Reasonable adjustments for staff and applicants

Where a rule, practice or physical feature, or the lack of an auxiliary aid, puts a disabled employee or applicant at a substantial disadvantage, we will take the steps it is reasonable for us to take to avoid that disadvantage (ss.20-21). In practice:

- applicants are asked whether they need any adjustment for the application, interview or assessment, such as extra time, a ground-floor room or documents in a different format;
- employees can ask their line manager or the Operations Manager at any time. We will discuss it with them in confidence, take occupational health or GP advice where needed (POL13), agree adjustments in writing and review them;
- typical adjustments include changes to shift length or start times, rest breaks, site allocation, equipment, phased returns and time off for treatment;
- where a role has genuine requirements, such as those set by SIA licensing, the client contract or the assignment instructions, those requirements must themselves be lawful. We will consider adjustments to them, including whether a client instruction or site rule itself needs to be adjusted, and we will consider other suitable work, before deciding that a requirement cannot reasonably be met. Officers must escalate a conflicting client instruction to the Duty Control Room or a manager. They must not refuse an adjustment, or follow an instruction that would be discriminatory, solely because a client rule says so (ss.20-21, s.39, ss.111-112).

6. Recruitment, screening and positive action

- Job adverts, descriptions and selection criteria are based on the real requirements of the job, including the SIA licence and the client's assignment instructions, and are checked for unjustified requirements, such as unnecessary age or physical criteria.
- We do not ask about an applicant's health before offering work, except where the law allows, for example to make adjustments for the selection process or to establish whether they can carry out a function intrinsic to the work (s.60). Any offer that depends on health checks says so.
- Security screening to BS 7858 is carried out for every new starter under FP.03 Recruit & Screening Process, and is recorded under FP.03, including where an external screening provider carries out the checks. Screening and right to work checks (POL12) are applied in the same way to every applicant, whatever their nationality or background, and a past conviction is assessed against the requirements of the role and the SIA criteria, not used as a blanket bar.
- Interviews are carried out, where possible, by two people. Selection decisions and reasons are recorded and kept under CP.20.
- **Positive action** only as the law allows: we may encourage applications from under-represented groups, for example by advertising more widely (s.158). We may prefer a candidate who shares an under-represented protected characteristic only where candidates are as qualified as each other, never as a fixed policy, and only where it is proportionate (s.159). We do not operate quotas or positive discrimination.
- Any genuine occupational requirement to have a particular characteristic, for example a same-sex searcher, will be used only where it is a proportionate means of achieving a legitimate aim (Schedule 9, paragraph 1) and recorded with the reason.

7. Equality in service delivery to clients and the public

Our officers are often the first people the public meet on a client's site. Service providers must not discriminate against, harass or victimise people using a service (s.29). Officers will:

- treat every visitor, resident, customer and member of the public courteously and consistently, and make decisions on entry, refusal, searching or removal by behaviour and the client's lawful rules, never by a protected characteristic or by

stereotyping. If a client rule or instruction would require discrimination or would prevent a reasonable adjustment, officers must escalate it to the Duty Control Room or a manager and must not follow it;

- make reasonable adjustments for disabled people, for example extra time, clear communication, help with access routes, and allowing assistance dogs. A client's "no dogs" or similar rule does not, by itself, justify refusing an assistance dog. Officers must escalate any client instruction that would refuse an assistance dog, or otherwise conflict with this Policy, to the Duty Control Room or a manager, and must not refuse access solely because of a blanket client rule. K9 handlers keep their dog under close control and away from assistance dogs;
- carry out searches with respect, by an officer of the same sex where practicable, and offer a private area where practicable. If the client's procedures would prevent this, officers must escalate to the Duty Control Room or a manager;
- report any discriminatory instruction, behaviour or complaint to the Duty Control Room or a manager, and record incidents on QC.22 Incident Report where needed. Hate incidents and crimes are reported to the police.

Public-sector clients. Hallmark is not a public authority. When we work for councils and other public bodies, we will support them in meeting their Public Sector Equality Duty (s.149) by following their lawful equality requirements and assignment instructions, briefing officers on site-specific needs, reporting equality-related complaints and incidents promptly, and giving them the information they reasonably need. Where we exercise public functions, we will have due regard to the aims in s.149(1) in exercising those functions, as required by s.149(2). That duty depends on the nature of the function (s.150(5)), not on whether the contract describes the work as a public function.

8. Training and communication

- Every new starter will be briefed on this Policy, POL3 and POL37 at induction and will sign the QC.09 handbook acknowledgement. A record of the briefing and acknowledgement is kept.
- All staff will receive a refresher toolbox talk on equality, harassment and treating the public fairly at least once every 12 months. A record of the talk is kept.
- Directors and managers who recruit, roster or handle complaints will receive additional training on fair selection, reasonable adjustments and handling complaints. A record of that training is kept.
- This Policy is published on the company website, is available to staff on C247 and at Head Office, and is available to clients, applicants and the public on request.

9. Complaints, grievances and whistleblowing

- Staff who believe they have been discriminated against, harassed or victimised can raise it informally with their line manager or any manager they trust, or formally under the **Grievance Procedure in QC.09**, with the right to be accompanied and to appeal under the Appeals Procedure. Harassment complaints follow POL3 or POL37. Nobody has to raise a concern with the person it is about.
- Applicants, clients and members of the public can complain to the Operations Manager or Managing Director at Head Office. Complaints are investigated promptly and answered in writing.
- Concerns about wrongdoing in the public interest, including sexual harassment, can be raised under the **Whistle Blowing Policy (POL11)** and the Whistleblowing chapter of QC.09. Workers who make a qualifying disclosure are protected by law (Employment Rights Act 1996, section 43B, which includes sexual harassment since 6 April 2026).
- Nobody will be treated less favourably for raising a concern, supporting someone else's complaint, or giving evidence, including where a complaint is not upheld or was honestly mistaken. An unsubstantiated complaint is not, by itself, misconduct. A complaint, evidence or allegation that is false and was made knowingly in bad faith may be dealt with under the disciplinary procedure, after investigation and subject to the protections in this Policy and in QC.09.

10. Monitoring, responsibilities and review

Monitoring. Because we are a small company, monitoring is kept simple. Case records of discrimination, harassment and equality-related complaints, and of adjustment requests and outcomes, are kept confidentially, with access restricted to those who need them to investigate, decide or review, because the circumstances can identify the person.

We may also invite applicants and staff to complete a voluntary equality monitoring form, kept separate from application forms and never seen by those making selection decisions. In a small workforce those forms may still identify someone, so they are treated as personal data, and where they include information about health, race, religion or belief or sexual orientation, as special category data. Results are reported as totals only, and small numbers are suppressed where a group is so small that a person could be identified. Special category data is processed only as the data protection legislation allows, including under an appropriate policy document where the law requires one. The Managing Director reviews the totals at Management Review and acts on any trends.

Role	Responsibilities
Managing Director	Ian Ross, Managing Director, owns this Policy and is the Company's equality lead. Makes sure resources and training are in place, decides on adjustments that need investment, reviews monitoring and complaints at Management Review, and signs off this Policy each year.
Operations Manager	Day-to-day contact for equality questions and adjustment requests; makes sure recruitment, rostering and site allocation are fair; briefs officers on site equality needs; handles client and public complaints.
Finance Director	Makes sure pay, overtime and expenses are applied consistently, and checks for unexplained pay differences between groups doing equal work.
All staff	Treat colleagues, clients and the public with dignity and respect; follow this Policy; report discrimination, harassment or victimisation they experience or see.

Review. This Policy is reviewed at least every 12 months from its issue date, after any change in the law or statutory guidance (including any regulations under s.40B of the Equality Act 2010 on "reasonable steps"), after any upheld discrimination or harassment complaint, and when a client contract requires it.