

Equality, Diversity, Inclusion, Fairness & Respect (EDI & FIR) Policy

DOCUMENT CONTROL

DATE	Revision/Details/Reason	Author
16/11/21	04/Format edited; doc control added	TA
01/04/22	05/Updates following further review	TA
30/04/23	06/Reviewed	ER
30/04/24	07/Reviewed	ER
17/09/25	08/Reviewed	TA
01/10/25	09/Renamed and updated.	TA
20/01/26	10/Integrated EDI & FIR	ER

The policy was approved on 24/02/2020, following a policy review consultation with Directors, Associates, and staff.

Overall responsibility for the implementation of the policy lies with Toby Adam (Director). For more information, please contact this person:

Signed 

Position: Director

Last reviewed: 20/01/2026

Next review: January 2028

Contact us:

Gaunt Francis Architects
23 Womanby Street, Cardiff, CF10 1BR
The Clubhouse, 20 St Andrews Street, London, EC4A 3AG

Telephone +44 (0)29 2023 3993

Email info@gauntfrancis.co.uk

Statement of Intent

We recognise our responsibilities under the Equality Act 2010 and are committed to creating and maintaining a workplace and professional environment based on Equality, Diversity, Inclusion, Fairness and Respect (EDI & FIR). We aim to build an organisation that makes full use of the talents, skills and experience of a diverse workforce and where people feel respected, valued and able to achieve their potential.

We commit to fostering a culture of dignity, inclusion, psychological safety and professional respect in which all individuals are treated fairly and consistently, and where inappropriate behaviour is actively challenged.

We will train managers and all other employees about their rights and responsibilities under the equality, diversity, and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation, and unlawful discrimination.

We will make this policy available to all employees throughout the organisation and share as appropriate with recruitment agencies, agency staff and contractors.

We will deliver internal training programmes that incorporate raising awareness of the Equality, Diversity, Inclusion, Fairness and Respect (EDI & FIR) Policy, wherever practical.

We will take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others during the organisation's work activities.

We will follow our **Disciplinary Policy** and procedure in cases where there has been a breach of this policy.

We will follow our **Grievance Policy & Procedure** for any employee who believes they have been treated unfairly or subjected to discrimination, harassment, bullying or victimisation.

We will procure goods and services only from organisations that demonstrate a commitment to meet the requirements of the Equality Act 2010.

We will make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.

We will review employment practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law.

We will monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the Equality, Diversity, Inclusion, Fairness and Respect (EDI & FIR) Policy.

All activities and operations undertaken by Gaunt Francis shall be subject to this policy.

Purpose

This policy sets out Gaunt Francis Architects' approach to:

- Meeting its legal obligations under the Equality Act 2010.
- Promoting equality of opportunity and eliminating discrimination.
- Actively valuing diversity.
- Creating an inclusive workplace culture; and
- Establishing clear expectations of fairness, inclusion and respectful behaviour.

Scope

Fairness, Inclusion and Respect in Projects and External Relationships

Gaunt Francis Architects expects the principles of Equality, Diversity, Inclusion, Fairness and Respect to be upheld in all project environments and professional relationships, including with:

- Clients
- Consultants
- Contractors
- Sub-contractors
- Site operatives
- Visitors and members of the public

We are committed to:

- Treating all project partners and workers with dignity, courtesy and professionalism.
- Ensuring that discriminatory, bullying or disrespectful behaviour on projects is challenged and addressed.
- Promoting inclusive and respectful site cultures, including zero tolerance for harassment, intimidation or exclusionary conduct.
- Taking proportionate action where behaviour on projects conflicts with this policy, including escalation through contractual, professional or disciplinary routes where appropriate.

All organisations and individuals working with or on behalf of Gaunt Francis Architects are expected to align with these standards of conduct.

Legal Framework and Protected Characteristics

This policy is underpinned by the Equality Act 2010. Unlawful discrimination, harassment and victimisation are prohibited in relation to the following protected characteristics:

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

Intersectionality

Gaunt Francis Architects recognises that individuals may experience disadvantage or discrimination arising from the interaction of more than one protected characteristic or social factor. These overlapping identities can create distinct and compounded barriers that are not always visible when characteristics are considered in isolation.

We are committed to taking an intersectional approach to equality and inclusion, ensuring that policies, decisions and support mechanisms are sensitive to the combined impact of multiple characteristics and that no individual is disadvantaged by the complexity of their lived experience.

No form of intimidation, bullying or harassment will be tolerated. For types of discrimination see the Annex to this policy.

Fairness, Inclusion & Respect Principles

Gaunt Francis Architects is committed to a working environment in which:

- Everyone is treated with dignity, courtesy and professionalism.
- Inclusive language and behaviour are the norm.
- Bullying, harassment, intimidation, discrimination, victimisation and microaggressions are not tolerated.
- Psychological safety is promoted so that individuals feel able to speak up, challenge ideas and raise concerns without fear.
- Work allocation, development opportunities, feedback and recognition are managed fairly and transparently.
- Power and seniority are exercised responsibly and respectfully.

Fairness

Gaunt Francis Architects defines fairness as the consistent, transparent and impartial treatment of all individuals, ensuring that decisions, opportunities and resources are allocated based on objective, role-relevant criteria and free from bias, favouritism or discrimination.

Fairness means that:

- Comparable situations are treated consistently.
- Differences in treatment are based only on legitimate, proportionate and evidenced business reasons.
- Individuals are given equitable access to opportunity, support, feedback and progression.
- Processes are clear, explainable and open to challenge.

Roles And Responsibilities

Directors and Managers shall:

- Lead by example in upholding EDI & FIR principles.
- Ensure fair and inclusive management practices.
- Take prompt and appropriate action where concerns are raised.
- Support reasonable adjustments and flexible working where appropriate.

Employees and Workers shall:

- Comply with this policy.
- Treat others with dignity and respect.

- Challenge and report inappropriate behaviour.

Working Environment and Behavioural Standards

All individuals are expected to:

- Conduct themselves in a respectful and inclusive manner in studios, on site, in meetings, at client events, at social functions and in digital communications.
- Treat colleagues, clients, consultants, contractors and members of the public with professionalism and courtesy.
- Challenge inappropriate behaviour constructively and report concerns where necessary.
- Avoid language or conduct that could reasonably be perceived as offensive, demeaning, intimidating or exclusionary.

All individuals have a right to be treated with dignity and respect, and the Company takes reasonable steps to protect staff from discrimination, bullying or harassment and, in the event of a complaint, we will take appropriate action to prevent, as far as possible, a further occurrence.

All staff are encouraged to report any incidents of inappropriate or unacceptable behaviour at work or that occurs during employment, on or off premises, including at work social events (whether organised by the Company or not) or at formal or informal events involving staff, customers or other work-related contacts.

The Company has a separate **Anti Bullying & Harassment Policy** and procedure for dealing with such complaint.

When Does This Policy Apply?

This policy applies to all conduct in the workplace and also outside of the workplace that is work related (e.g. at meetings, social events and social interactions with colleagues) or which may impact on Gaunt Francis' reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to Gaunt Francis).

We set out below some specific areas of application:

a) Recruitment

Recruitment is typically made through recruitment agencies. Any agencies involved in Gaunt Francis' recruitment will be made aware of Gaunt Francis' equality policy, as well as other relevant policies. Selection for employment at Gaunt Francis will be based on aptitude and ability. We will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled job applicants are not disadvantaged.

b) Training

GFA is committed to ensuring its staff and managers are trained in equality and diversity and aims to ensure that adequate training is provided so that managers can operate this policy. Examples include specific training on race, gender, gender identity, disability, sexuality, age and religion or belief, in accordance with the requirements of the law and good practice.

Equality, diversity, and inclusion form an integral part of the GFA induction package. Managers are to ensure that all new entrants are made aware of this **Equality, Diversity, Inclusion, Fairness & Respect (EDI & FIR) Policy**

c) Promotion

All promotion decisions will be made based on merit and will not be influenced by any of the protected characteristics listed above. Promotion opportunities will be monitored to ensure equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.

d) During employment

The benefits, terms and conditions of employment and facilities available to Gaunt Francis employees will be reviewed on a regular basis to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the special needs of disadvantaged or under-represented groups. Discrimination based on work pattern (part-time working, fixed term contract, flexible working) which is unjustifiable will also not be tolerated.

Employment Policies and Practices

Gaunt Francis aims to ensure that employment policies and practices, including any rules or requirements, do not directly or indirectly discriminate and are applied in a non-discriminatory manner. We will ensure that all disciplinary decisions are fair and consistent and that any selection for redundancy is based on objective criteria.

Fair and Transparent Decision Making

All people-related decisions, including recruitment, promotion, performance assessment, reward, disciplinary action and redundancy selection, shall be:

- Based on objective, role-related and evidence-based criteria.
- Documented and capable of independent review.
- Free from bias, discrimination and conflicts of interest.

Right to Explanation

Employees have the right to receive a clear and meaningful explanation of decisions that affect their employment, including the criteria applied and how those criteria were assessed. Where decisions are challenged, the Company will provide appropriate transparency while respecting confidentiality and data protection requirements.

Gaunt Francis will consider making appropriate reasonable adjustments to the working environment, work arrangements, workstation that would alleviate or remove any disadvantage these may cause staff who are disabled.

We will aim as far as reasonably practicable to accommodate the requirements of different religions and cultures including dress code and time off for religious events.

We will consider requests from employees to vary or change their working pattern to enable them to balance their work and home lives, for example, to care for a dependant. Such requests will be considered in accordance with the Company's **Flexible Working Policy**.

Organisational communications processes will be undertaken in order that everyone is included and provided with access to the information they need to enable them to perform their roles within the organisation. This includes employees who work in a non-full-time way; those on family leave, such as maternity, paternity, adoption, parental and shared parental

leave (see the Company's leave policies); those employees with disabilities; and those whose first language is not English.

In trying to accommodate individuals' needs, where relevant the Company may need to do so in accordance with its **Health and Safety Policy** and its legal duty of care to all employees.

Complaints, Grievance and Disciplinary Procedures

Any individual who believes they have experienced discrimination, harassment, bullying or a breach of this policy may raise concerns through their line manager, **the Grievance Procedure** or the **Anti-Bullying and Harassment Policy**. Victimisation of individuals who raise concerns in good faith will not be tolerated.

Breaches of this policy may result in disciplinary action up to and including dismissal.

Terms and Conditions

Our terms and conditions of service will be applied fairly, and benefits and facilities will be made available to all staff who should have access to them, as appropriate.

The Company operates a pay and benefits system that is transparent, based on objective criteria and free from bias to ensure that all employees are rewarded fairly for their contribution and loyalty.

Terms and conditions of employment for part-time employees will be provided on a pro-rata basis to full-time employees. Similarly, the terms and conditions for fixed term employees will be comparable with those given to permanent employees, except when different treatment can be objectively justified.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. Gaunt Francis will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably by Gaunt Francis as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under Gaunt Francis' Discipline Policy.

A person found to have breached this policy may be subject to disciplinary action under Gaunt Francis' Disciplinary Policy.

Employees may also be personally liable for any acts of discrimination prohibited by this policy that they commit, meaning that they can be sued by the victim.

Communication

This Equality, Diversity, Inclusion, Fairness & Respect (EDI & FIR) Policy is available on the GFA intranet and external website. Please contact HR Administration if you require a copy in an alternative format.

The details of this policy will be proactively communicated and promoted to all current staff and new starters.

How Equality Issues are Reviewed or Monitored

We will review employment practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law.

RIBA Inclusion Charter

Gaunt Francis Architects is a signatory to the RIBA Inclusion Charter and commits to:

- Acknowledge the urgent need for inclusion in the architecture profession and wider construction industry.
- Commit to setting inclusion targets and an EDI action plan for our practice.
- Commit to developing our workplace culture, talent pipeline and ways of working to support inclusion.
- Commit to publicly reporting on progress of our EDI plan - transparency and accountability are vital to drive cultural change.
- Commit to embedding inclusive design in all projects and contributing to the development of inclusive environments.

Action Plan for Improving Equality, Diversity, and Inclusion

By April 2026, we will:

Collect data on gender pay gap and benchmark against other UK architectural practices using the RIBA Chartered Practice benchmarking toolkit.

Collect data on the make-up of our workforce and benchmark against other UK architectural practices using the RIBA Chartered Practice benchmarking toolkit.

Provide alt-text for images on our website to improve automated readability and legibility for sight-impaired visitors.

Further Information

The National Archives – Equality Act 2010

<http://www.legislation.gov.uk/ukpga/2010/15/contents>

Equality & Human Rights Commission - What is the Equality Act?

<https://www.equalityhumanrights.com/en/equality-act-2010/what-equality-act>

ANNEX - Types of Discrimination

There are various types of discrimination prohibited by this policy.

Types of Discrimination – New Definitions

This document is a useful guide and highlights the definitions as laid out in the new Equality Act 2010 and should be read in conjunction with any Gaunt Francis' existing policies and procedures that refer to discrimination, harassment and victimisation.

All relevant policies and procedures will be updated in due course to reflect the amended definitions.

Protected characteristics are the grounds upon which discrimination is unlawful. The protected characteristics under the Equality Act 2010 are: Age, disability, gender reassignment, marriage, civil partnership, pregnancy, maternity, race, religion or belief, sex and sexual orientation

Direct Discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see 'perceptive discrimination' below) or because they associate with someone who has a protected characteristic (see 'associative discrimination' below).

Associative Discrimination already applies to race, religion or belief and sexual orientation. This is now extended to cover age, disability, gender reassignment and sex. It means direct discrimination against someone because they associate with another person with a protected characteristic.

Perceptive Discrimination already applies to age, race, religion or belief and sexual orientation. This is now extended to cover disability, gender reassignment and sex. It means direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person doesn't possess that characteristic.

Indirect Discrimination already applies to age, race, religion or belief, sex, sexual orientation and marriage and civil partnership. This is now extended to cover disability and gender reassignment.

Indirect Discrimination can occur when Gaunt Francis has a condition, rule, policy or even a practice in the company, that applies to everyone but particularly disadvantages people who share a protected characteristic.

Harassment is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Harassment applies to all protected characteristics except for pregnancy, maternity, marriage and civil partnership. Employees will be able to complain of behaviour they find offensive – even if it is not directed at them. Employees do not need to possess the relevant characteristic themselves and are also protected from harassment because of perception and association.

Third Party Harassment occurs already applies to sex and is now extended to cover age, disability, gender reassignment, race, religion or belief and sexual orientation. The Equality Act makes Gaunt Francis potentially liable for harassment of employees by people (third parties) who are not GFA employees, such as customers, clients and visitors. Gaunt Francis will only be liable when harassment has occurred on at least two previous occasions, they are aware it has taken place and have not taken reasonable steps to prevent it from happening again.

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act, or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Disability is when a person has a physical or mental impairment with a long-term adverse effect on their ability to carry out day-to-day activities, which would include things like using a telephone, reading a book or using public transport.

The Act includes a new protection from discrimination arising from disability. A disabled person should not be treated unfavourably because of something connected with their disability (e.g. spelling mistakes due to dyslexia). This is unlawful where Gaunt Francis or other persons acting on behalf of Gaunt Francis knows or could reasonably be expected to know that the person has a disability. This type of discrimination is only justifiable if Gaunt Francis can show that it is a proportionate means of achieving a legit