

## **Diversity & Inclusion Policy**

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### **1. INTRODUCTION**

- 1.1 To enable us to achieve our business objectives, create better cultural awareness and promote understanding and better communication, a diverse workforce is essential.
- 1.2 Diversity helps us to achieve a competitive advantage by expanding and developing the pool of talent on which we can draw. Growth depends not only on the ability to attract the best workforce but also to foster, support and retain our current employees. We work with diverse clients and a workforce that is representative of our clients which promotes a better understanding of their business needs.
- 1.3 We are committed to providing equal opportunities in employment and to providing a workplace which is free from discrimination and harassment. This means that all job applicants, employees, partners and third parties who come into contact with us, will receive equal treatment regardless of age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 1.4 Diversity and Inclusion is a standing agenda item at our Equity Partners Meetings, on our CSR Committee and Staff Forum. It is considered at every level in order to ensure that we recruit, retain and promote the best people irrespective of their background to meet our current and future business needs. We also require all of our material suppliers to demonstrate their commitment to diversity and inclusion.

### **2. SCOPE**

- 2.1 This policy applies to all current and potential employees, consultants, partners, clients and suppliers.

- 2.2 It covers all aspects of employment, including: recruitment and selection, training and development, performance management (appraisals), reward and promotion, terms and conditions of service and termination. Decisions relating to any of these must be based solely on ability and performance.

### **3. LEADERSHIP**

- 3.1 The Equity Partners, the COO and the Head of HR provide leadership for Devonshires on Diversity matters. They are ultimately responsible for overseeing, assessing and making recommendations in this area. They review this policy on an ongoing basis to reflect changes in the law, demographics and business needs.
- 3.2 Whilst they will drive diversity within the firm, it requires everyone's commitment and co-operation to ensure it continues to be successful.

### **4. IMPLEMENTATION AND COMPLIANCE**

- 4.1 All employees and partners are responsible for the promotion and advancement of this policy.
- 4.2 Behaviour which transgresses this policy will not be tolerated and will be dealt with in line with our disciplinary policy. If necessary the grievance procedure may need to be implemented where a complaint is raised.
- 4.3 Advice on diversity is available from the HR team.

### **5. MONITORING**

- 5.1 To ensure this policy is operating effectively (and for no other purpose) and to the extent it is possible, we maintain records of all applicant and employee details relating to age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation and socio economic background. This statistical data is used to provide ongoing assessments of our staff profile and will be treated in the strictest confidence. All employees are requested to provide this data and for each question asked there is an option for individuals to choose not to answer.

- 5.2 We benchmark the composition of our workforce against diversity statistics for City of London, Greater London and the UK.

## **6. DISCRIMINATION AND HARASSMENT – LEGAL CONTEXT**

- 6.1 It is unlawful to discriminate, directly or indirectly, in respect of a person's age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. Breach of anti-discrimination legislation may result in both employees and Devonshires becoming involved in criminal and/or civil proceedings.
- 6.2 Every employee has the right and is encouraged to report any incident of discrimination or harassment. All complaints will be treated confidentially and investigated thoroughly. Unlawful discrimination, harassment or bullying will not be permitted or condoned; such actions are deemed to be gross misconduct under our disciplinary procedure.

## **7. RECRUITMENT**

- 7.1 Recruitment of all employees is conducted in a systematic way which enables us to select the most suitable candidates.
- 7.2 Formal procedures exist for short-listing, testing and interviewing so that applicants are assessed based on their skills, abilities, experience and knowledge alone.
- 7.3 We welcome applications from groups where we are currently under represented.

## **8. TRAINING**

- 8.1 All our employees and Partners receive regular diversity training from an external provider. All new joiners receive diversity training as part of their induction from an external provider. It is a contractual requirement that staff and partners complete this training when invited to do so.

## **9. PROMOTION AND OPPORTUNITIES**

9.1 Decisions relating to promotion and work-related opportunities are based on merit and ability alone. Decisions are made without regard to age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

## **10. REWARD**

10.1 Salaries are reviewed on an annual basis, as determined by individual and firm performance along with a consideration of market rates and economic performance within the sector. The HR team monitor salary reviews to ensure that pay increases are applied consistently and fairly across the practice.

## **11. PROFESSIONAL DEALINGS**

11.1 Employees and partners must not in their professional dealings with current or potential employees, consultants, partners, clients, suppliers or other third parties, discriminate against any person nor victimise nor harass them on the grounds of age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation.

11.2 Whilst we are generally free to decide whether or not to accept instructions from a client, we must not refuse to act for them on the basis of any of the above unlawful grounds. We must also ensure that, when instructing a barrister, we and/or any person assisting us with our choice of barrister, do this on the basis of skill and ability rather than on any unlawful ground. If a client's choice of barrister is based on an unlawful ground, employees and other partners must immediately refer this to their supervising partner who will carefully discuss this with the client.

11.3 We are not able to act for any client or supplier who refuses to modify their own discriminatory behaviour.

11.4 Where we become aware that the behaviour or practice of a client or supplier may be discriminatory we will take appropriate action in the circumstances. Such action may include informing the client or supplier of the unacceptable

nature of their behaviour or where appropriate not working with the client or supplier going forward.

- 11.5 The practice will not tolerate discriminatory behaviour on the part of its clients or suppliers.
- 11.6 Contractors, agents or other third parties instructed by the practice must be maintained on the basis of the skill and ability of these third parties alone and must not contain any discriminatory bias.
- 11.7 It is important also to establish whether a third party is disabled to ensure that in all of our dealings with them, they are not disadvantaged in any way and that appropriate adjustments are made to accommodate them in a similar way to that in which we would do for an employee. Adjustments may include e.g., printing documents in larger typeface or employing the services of sign language interpreter at seminars.

## **12. DISCIPLINARY AND GRIEVANCE PROCEDURES**

- 12.1 Proven acts of discrimination, victimisation or harassment on grounds of age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation by employees or partners of Devonshires will result in disciplinary action. Failure to comply with this policy will be treated in a similar fashion.
- 12.2 We will treat seriously and take action wherever necessary, when an employee or partner has a grievance as a result of discrimination or harassment on any of the protected grounds.
- 12.3 Please refer to the Disciplinary and Grievance Procedures for further information.
- 12.4 Any breach of this policy is admissible in evidence in disciplinary proceedings conducted by third parties such as the SRA/Solicitors Disciplinary Tribunal.