



Equality, Diversity & Inclusion Policy



Purpose

Premier Lotteries Ireland recognises that its customers and staff come from diverse backgrounds, with varying experiences and needs. We are committed to ensuring diversity & inclusion is embedded into our day-to-day working practices. PLI actively promotes fairness, respect, equality, diversity, inclusion, and engagement and is committed to continuous improvement.

Through our policies and in our day-to-day work and fulfilment of our legal responsibilities, PLI is committed to promoting equality and fairness and combating discrimination. This applies to everyone regardless of Gender, Civil status, Family status, Sexual orientation, Religion, Age, Disability, Race (includes race, colour, nationality or ethnic or national origins) or Membership of the travelling community.

This policy sets out how Premier Lotteries Ireland will achieve its aims to promote diversity & inclusion as an employer and supplier of services. It outlines how Diversity & Inclusion will underpin all areas of the organisation's work and service provision, including the communities within which it operates and serves. This policy links to all policies, procedures and strategy documents adopted by Premier Lotteries Ireland. Specific reference is made to the following documents:

- Disciplinary Procedure
- Grievance Procedure
- Respect & Dignity at Work Policy

Scope

This policy applies to the organisation, its Board members, employees, partners and to any external stakeholders which are supported by or engage with the organisation.

Diversity & inclusion imposes rights and responsibilities on every member of staff. All employees and the Board of Directors will be informed that a Diversity & Inclusion policy is in operation and that they are bound to comply with its requirements. The policy will also be drawn to the attention of external stakeholders, job applicants and customers.

The policy ensures that our statutory equality duties outlined in the Employment Equality Acts 1998-2015 and the Equal Status Act 2000 are met.

The 9 grounds are defined as being:

- Gender
- Civil status
- Family status
- Sexual orientation
- Religion
- Age
- Disability
- Race (includes race, colour, nationality or ethnic or national origins)
- Membership of the travelling community.

Objectives

To effectively implement its commitment to being an equal and diverse organisation, PLI has identified the following objectives:

- Provide the organisation's leaders with the skills and knowledge to fully embed fairness, respect, equality, diversity, inclusion and engagement into the organisation's culture, strategy, and processes.
- Provide diversity & inclusion training to staff and senior leadership team, which will include content on their responsibilities, relevant legislation, and this policy.
- Ensure that no customer or potential customer receives less favourable treatment than any other, making adjustments to services where necessary in order to facilitate this.
- Ensure opportunities are accessible to all, introducing reasonable accommodations to facilitate this where required.
- Gather data to enable the monitoring of customer and staff satisfaction to identify and address any negative trends by the 9 grounds of discrimination.
- Create an environment where staff and customers are treated fairly and with dignity and respect.
- Enforce a zero-tolerance approach in relation to discrimination, bullying, harassment and inappropriate behaviour, thoroughly investigating any reported incidents and taking appropriate actions.
- Ensure fair treatment for job applicants, which is free from bias.
- Make the best possible use of our existing and potential workforce through effective talent management.
- Provide a safe, supportive and welcoming environment where everyone can contribute to their fullest potential.
- Challenge discrimination and promote diversity.
- Provide training to staff on PLI's approach to diversity & inclusion, its commitment to zero tolerance in relation to discrimination, bullying, harassment and inappropriate behaviour and the contents of this policy.
- Act as role models to partner organisations and other external stakeholders.
- Undertake Equality Impact Assessments on all policies, processes, and procedures to ensure that no direct or indirect discrimination exists within these.

Key Equality & Diversity Concepts

- **Diversity** can be defined as the visible and non-visible differences between individuals. These differences can be related to race, ethnicity, religion, age, disability, sexual orientation, and gender, as well as the many differences in values, attitudes, beliefs, cultural views, skills, knowledge, education, background, employment, parenthood, marital status, and life experiences of every individual.

- **Equal Opportunities** can be defined as ensuring all those involved with or wishing to be involved with the organisation, regardless of their diversity, are provided with opportunity based on their ability or potential to perform the required activity.
- **Discrimination** is unequal treatment of an individual because of their membership of a particular class or group, such as sex, race or trade union. It may be direct, for example, refusing to send someone on a training course because they are married or have children. It may be indirect, for example, declaring a post as being suitable only for a full-time member of staff without proper justification (i.e establishing the need for a full-time member of staff rather than for part-timers or job sharing).

Discrimination may be subtle and unconscious and may not be easy to identify. For example, discrimination sometimes results from general assumptions about the capabilities, characteristics and interests of particular groups or individuals, which are allowed to influence the treatment of staff or job applicants or clients. This includes unconscious bias.

- **Harassment or bullying** has the effect of causing undue stress on individuals and of demotivating them. Harassment or bullying of any kind will not be tolerated and serves to undermine the safe, supportive, and welcoming environment which PLI wishes to encourage.

Management and Delivery of this Policy

Fairness, Respect, Equality, Diversity, Inclusion and Engagement are the responsibility of everyone within Premier Lotteries Ireland.

The Senior Leadership Team of Premier Lotteries Ireland is committed to embedding Diversity & inclusion within the business, ensuring that everything we do and the manner in which it is done, makes reference to and considers the impact upon our equality objectives.

Premier Lotteries Ireland aims to work with partners and external stakeholders who operate their businesses with similar equality objectives and delivers its services with the same ethos. This will be enabled within the procurement process.

It is the responsibility of Premier Lotteries Ireland's Chief Executive to implement, monitor and evaluate the diversity & inclusion policy in terms of employment practices (selection, recruitment and retention) and service delivery. The Chief Executive is also under a duty to ensure that the Board of Directors is regularly kept updated in terms of the policy's implementation. Additionally, the implications for the Board arising from the decisions it makes and the policies it introduces must be made clear to the Board.

The Policy will be communicated to staff, visitors, customers, and other stakeholders using a variety of methods such as the staff intranet, the website, displayed in offices and where appropriate included in publications.

Annual work plans are in place, which specifically address the diversity & inclusion aspects of all areas of work for staff and the Senior Leadership Team; these support the delivery of the objectives contained within this policy.

Our staff will receive appropriate training to ensure they understand their responsibility not to discriminate and to treat everyone with respect and dignity. Staff are expected to be aware of personal prejudices, unconscious bias and stereotypes and avoid labels at all times.

All staff will be made aware of and follow the requirements in the Dignity at Work Policy.

Existing processes will be used to review and investigate any complaints in relation to discrimination, harassment or bullying as follows:

- staff - Disciplinary and Grievance procedures
- customers (those using our services) - Complaint's procedure

It is expected that when staff or Board Members represent Premier Lotteries Ireland at any time, including through attendance at committees, meetings with external stakeholders and contact with customers, they will ensure that the diversity & inclusion principles and practices outlined in this policy are adhered to.

When representing Premier Lotteries Ireland on the committees of other agencies, each staff member or Board Member will endeavour to ensure that diversity & inclusion principles and practices are adopted by those agencies.

We will use an Equality Impact Assessments framework to regularly review our policies, to minimise the possibility of directly or indirectly discriminating against any group or individual as a result of our working methodologies.

Selection, Recruitment and Retention

Premier Lotteries Ireland aims to promote diversity & inclusion as an employer. It also aims to ensure that no job applicant or employee receives less favourable treatment or is disadvantaged by conditions or requirements that cannot be shown to be justifiable within the context of the policy.

Selection, recruitment, training, promotion, and employment practices generally will be subject to regular review to ensure they comply with this policy. In particular, selection and recruitment procedures will be reviewed annually in order to constantly improve diversity & inclusion practices and respond to changes in legislation. Premier Lotteries Ireland will monitor data trends and measure our progress on all diversity demographics on employees who consent to share their data to identify any practices that unintentionally discriminate against specific groups.

Employees involved in the selection and recruitment process, and in the management of staff, will receive appropriate training to ensure they recognise when they are making stereotypical assumptions or judgements about people, and avoid any discriminatory practices in the way in which they shortlist, recruit, or manage employees. This will include unconscious bias training.

We regard discrimination, harassment, abuse, victimisation or bullying of staff, customers or of others in the course of work as disciplinary offences that could be regarded as gross misconduct. Condoning such behaviour could also be treated as a disciplinary offence. As well as disciplining the perpetrator(s), we will give appropriate support to people who complain of harassment of themselves or others.

Premier Lotteries Ireland has considered the working practices it has in place to address inequality, and discrimination and how it promotes fairness for all. Examples of these against each of the protected characteristics are given below but is not a definitive list of all that Premier Lotteries Ireland does.

We recognise that employees of any gender have different needs at different stages during their career, for example to balance work and caring responsibilities. We will attempt to accommodate staff requests to work flexibly, whether part-time or some other working arrangement, for whatever reason, so long as agreement is consistent with the needs of the organisation. We will also encourage initiatives designed to help staff who wish to return to work after a career break.

Our terms and conditions of employment allow for family leave, in accordance with current legislation. Allowance is also made for compassionate and dependent's leave to deal with domestic emergencies through our family friendly policies.

We recognise that organisations are obliged, under the Employment Equality Acts 1998–2015 to make reasonable accommodations to support disabled people and enable them to do their job without unnecessary difficulty. We will make accommodations which are reasonable, whether or not we are obliged to do so by law, and whether or not a disabled applicant or employee is covered by the definition of ‘disabled’ under the Employment Equality Acts 1998–2015

We are committed to ensuring employees do not experience discrimination (or less favourable opportunities/treatment) on the basis of their race, religion or belief by:-

- Allowing time and, if possible, a place for prayers during the working day and at the workplace as appropriate.
- Considering employees' dietary requirements in catering for staff, and when providing facilities for staff to eat and store food.
- Allowing staff of all faiths to take their holidays for religious festivals and other religious observance.
- Trying to arrange job interviews or other important work meetings at times when they do not clash with important religious festivals.
- Not imposing a dress code with which people of a particular religion cannot comply.

We will not discriminate on grounds of age in recruitment, promotion, training, or the availability of benefits - such as pension contributions or health insurance.

We will not discriminate on the grounds of gender, where an individual is in the process of gender reassignment or where an individual has completed this reassignment.

Premier Lotteries Ireland will not discriminate on the grounds of marriage or civil partnership and will support individual need as required.

We will not discriminate on the grounds of an individual's sex or on the grounds of the sexual orientation providing everyone, with exactly the same opportunity to achieve their goals.

As part of its talent management strategy, Premier Lotteries Ireland will operate an annual staff appraisal system. Training or education development to enhance potential within the existing job, arising out of needs identified through appraisal or from other circumstances, will, where appropriate or possible, be provided. We may, in certain circumstances, allow for paid or unpaid leave for training or educational purposes.

Premier Lotteries Ireland's retention, reward and progression processes are fair and take account of the social, domestic, cultural, and physical obstacles to people progressing. We seek to identify where these exist for individuals and take actions to limit these where necessary.

We undertake review of pay and continually work towards eliminating any unfair pay gaps where these are identified.

All training opportunities will be published widely through Line Managers and by other means to all appropriate employees, and not in such a way as to exclude or disproportionately reduce the numbers of applicants from a particular group. In all training opportunities we will pay due regard to the need to eliminate discrimination on the grounds set out in this policy.

Employment of People with Disabilities

PLI is committed to providing equality of opportunity to people in all aspects of employment. This includes ensuring that people with disabilities have full access to employment, training, promotion, and career development in the organisation.

Decisions to appoint a job candidate will be based on that candidate's abilities vis-à-vis the competence, qualifications and qualities needed to carry out the role.

PLI is committed to providing a safe working environment for all employees. The Company will ensure that any reasonable accommodations are made that will enable employees with a disability to carry out their duties efficiently and effectively.

PLI will provide equal access to training and development for employees with, and will also ensure that, where possible, employees with disabilities are facilitated in making a full contribution, through the alteration of workstations and the adjustment or modification of equipment and other practical and appropriate supports.

All employees have a duty to ensure that provisions in relation to staff with a disability are adhered to. In addition, we are committed to:

- Developing positive measures to encourage the recruitment, development and retention of people with disabilities and to make every effort to ensure the continued employment of any employee who gains a disability while working for our Company;
- Developing the skills and potential of employees with disabilities to the full and offer training and promotional opportunities according to their abilities and potential;
- Working with employees to regularly review work practices to ensure they do not exclude people with disabilities.

Unfair Treatment or Discrimination

Any employee who feels that they have been unfairly treated in terms of recruitment, conditions of employment, training, work experience or promotion should refer to our grievance procedure and policy.

If you have a concern of discrimination on any of the above stated grounds you should refer the matter to your Manager and/or the Human Resources Department, who will advise on appropriate next steps.

Any allegation of discrimination on grounds of gender, civil status, family status, sexual orientation, race, (including nationality and national origin) ethnic origin, membership of the traveller community, age, disability, religion or political beliefs will be thoroughly investigated and, where appropriate, will be dealt with under the discipline policy & procedure. The disciplinary response will depend upon the nature and seriousness of the incident; and may result in summary dismissal (instant dismissal without notice or pay in lieu of notice).

Service Delivery

We will use a variety of methods to regularly consult with our customers. We will gather their views on existing and planned services, including changes to provision. We will make public our commitment to combating discriminatory attitudes where these are encountered by publishing this policy widely amongst staff, partners, recognised trade unions and external stakeholders and in a variety of formats.

Contractors & Agency Staff

Premier Lotteries Ireland is committed to working with a wide range of suppliers, contractors, and agencies from local businesses through to large multi-nationals across a wide range of different types of contracts and purchases.

Diversity & inclusion will be considered during any procurement process carried out by PLI and may influence the awarding of contracts. All potential suppliers will be expected to adhere to and comply with all relevant legislation and standards in this area.

All individual contractors and agency staff are expected to read, understand, and adhere to this Policy when engaging on behalf of Premier Lotteries Ireland. They will also be expected to take part in any relevant training programmes or initiatives related to Equality, Diversity, and Inclusion when delivered within Premier Lotteries Ireland.

Monitoring and Evaluation

Premier Lotteries Ireland will systematically evaluate its services and the effectiveness of its diversity & inclusion policy by a variety of means.

Information gathered through the complaints, grievances, disciplinary or other appropriate processes will be analysed by the 9 Grounds of discrimination where this information is available to identify any particular trends. Where any negative trends are identified, these will be investigated fully and recommendations made to the Board.

We will report annually to the Board on the outcomes of monitoring and evaluation activities, including any trends in relation to particular 9 Grounds.

Related Policies

- Code of Conduct
- Confidentiality Policy
- Respect & Dignity at Work Policy
- Discipline Policy
- Employee Assistance Policy
- Grievance Policy
- Managing Stress Policy

Review Cycle

Responsibility for review of this policy sits with Premier Lotteries Ireland's HR Department. A formal review will be completed every two years. Additionally, an interim review would be conducted in the following circumstances:

- A change is made to relevant legislation, including but not limited to the Employment Equality Acts 1998–2015 and the Equal Status Acts 2000-2018
- The investigation into a negative trend indicates a review of this policy is appropriate
- An external review of our services identifies the need for a policy review

Please note that the list of reasons stated above are not exhaustive.