



(NBS Group) Diversity, Equity & Inclusion Policy

March 2024

LEVEL 3 – INTERNAL USE

Please contact the Diversity Equity & Inclusion team by emailing
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if you require this Policy in a different format.

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Intended Audience:	Enterprise Risk Committee (ERC), Board, Audit Committee, and all colleagues
Applies to:	“This policy applies to the Newcastle Building Society (NBS) Group (“the Group”), which includes subsidiaries Newcastle Financial Advisers Limited (‘NFAL’), Newcastle Mortgage Loans (Jersey) Limited (NM(J)L), Newcastle Strategic Solutions Limited (‘NSSL’), and MBS (Mortgages) Limited.”

Document History

Version	Date	Author	Details	Approved
v1.0	Oct 2021	Becky Craven	<ul style="list-style-type: none">• Policy Created	GRC October
v2.0	Mar 2024	Jennie Pitt	<ul style="list-style-type: none">• Significant policy amends to reflect the alignment to the Place to Be You strategy, the introduction of a DE&I statement, a new section on discrimination and reference to how the policy applies to the various touch points across the colleague lifecycle	

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1. Introduction

At Newcastle Building Society (NBS) we recognise that the success of our business depends on our people. Diversity, Equity & Inclusion is integral to our business and our Talent Strategy is to attract, recruit, develop and retain the absolute best people at all levels.

We value diversity in capabilities, experiences, perspectives, and approaches and are committed to creating a diverse workforce that represents the members, clients, and communities we serve and a 'Place to Be You' where all colleagues feel able to be themselves at work and can achieve their potential.

2. Purpose & Scope

We are committed to promoting a culture that actively values difference and recognise that all colleagues have the right to be treated with dignity and respect throughout their employment and not to be discriminated against, bullied, or harassed whatever their background or experience. This policy is therefore designed to ensure that all colleagues understand the importance of equality and diversity in the workplace irrespective of (but not limited to) age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

This policy has been written, taking into account the view of the regulators and it applies to all colleagues.

We define colleagues as; those directly employed by Newcastle Building Society, student placements, individuals on work experience, job applicants, temporary workers and those engaged by us on a contract for services.

3. Responsibilities

This policy applies to all aspects of your employment including when you apply for a new role, your terms and conditions of employment including pay, promotion, training, your performance reviews, your conduct and interactions at work, and our disciplinary and resolution procedures. It also applies to you when you are outside work socialising with your colleagues, attending work-related events or representing Newcastle Building Society externally.

In applying this policy, our aim is to ensure that all colleagues are free from discrimination, harassment, victimisation or bullying of any kind. We want all of our colleagues to have a positive and inclusive experience at work and to achieve this, we expect you to challenge any non-inclusive behaviours and practices you find.

If you fail to adhere to this policy, we may take further action including disciplinary action up to and including your dismissal. Please refer to the Disciplinary Policy for more details.

3.1 Colleagues

All colleagues are responsible for making sure that they are familiar with, and understand, the standards of behaviour outlined here and in other relevant policies.

As a colleague, we expect you:

- To familiarise yourself with this policy and to act in accordance with our commitment to diversity, equity, and inclusion at all times.
- To work in partnership to create an inclusive environment in which everyone's contributions are valued.
- To respect the rights of all your colleagues in an environment that is free from discrimination or harassment.
- To proactively challenge inappropriate behaviour and report breaches of this policy to your line manager or the HR team.

- To be an advocate of diversity, equity, and inclusion.
- To raise concerns with your line manager if you experience difficulties because of any disability, so that we can consider reasonable adjustments for you.

3.2 Line Managers

All managers have a responsibility for applying this policy in line with other relevant Group policies. We expect you to lead by example and ensure that your team members adhere to the policy and promote equity within the workplace.

As a line manager at, we expect you:

- To actively support diversity, equity and inclusion, so that all colleagues feel valued, involved, engaged, and respected.
- To ensure that the decisions you make affecting employment, training, promotion, reward, and career development are based on merit, focusing only on an individual's skills, talents, and ability.
- To engage with your colleagues to create an inclusive working environment and ensure that everyone is familiar with the policy and aware of their responsibilities.
- To proactively address any inappropriate behaviour including taking formal disciplinary action.
- To be an advocate for diversity, equity, and inclusion.
- To support relevant reasonable adjustments to accommodate colleagues needs.

3.3 Human Resources

The HR team will proactively assist line managers with the fair and consistent application of this policy and ensure it is reviewed and updated in line with regulatory requirements, legislation and good employer practice.

4. Our Diversity, Equity & Inclusion Statement

Including, respecting, and valuing others is integral to who we are and how we will continue to be successful. We are committed to creating an environment which ensures all colleagues are treated fairly and with dignity and respect whenever they deal with us and that our environment is free from harassment, bullying and discrimination.

4.1 How do we define diversity?

Diversity is the unique difference that individuals have, both visible and non-visible, some of which are known as 'protected characteristics' and these are protected by legislation. Other differences not included under the legislation which positively contribute to diversity of thought include socio economic factors, such as education and experience.

4.2 How do we define equity?

Equity is about ensuring that everyone, regardless of their background, protected characteristics or any other part of their identity receives fair treatment, access to opportunities and advancements while striving to eliminate barriers that put under-represented groups of people at an unfair disadvantage.

4.3 How do we define inclusion?

Inclusion embraces diverse perspectives and promotes a culture of involvement, engagement, support, and commitment from others so that you can do your best work. An inclusive culture creates a sense of belonging, respect, and value for who you are and recognises that the differences we have contribute to our success.

4.4 What is a protected characteristic?

We are committed to providing equal opportunities in employment from the moment you apply for a role with us and throughout your employment. The equitable treatment you receive will be regardless of the following protected characteristics which are recognised in law under the Equality Act 2010;

- Age
- Disability

- Gender reassignment
- Marriage and civil partnership status
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

5. Discrimination

Discrimination can take several forms:

- Direct discrimination – if you are treated less favourably because you have a protected characteristic.
- Indirect discrimination – there is a requirement or condition which is not justified but which disproportionately disadvantages one group with a particular protected characteristic.
- Discrimination by association – if you are treated less favourably because you associate with, or have a connection with, someone who themselves has a protected characteristic.
- Discrimination by perception – if you are treated less favourably because you are wrongly perceived to have a protected characteristic.
- Harassment – unwanted behaviour related to a protected characteristic and which you find offensive, or which makes you feel intimidated or humiliated. It can happen on its own or alongside other forms of discrimination.
- Discrimination because of a disability – you are disabled, and you are treated unfavourably because of something connected with your disability which cannot be justified.

You have the right to work in an environment where you feel confident to raise any concerns you may have. If you believe you are being bullied, harassed, or victimised you should discuss this with your line manager in the first instance. If you feel unable to discuss your concerns with your line manager, you can raise a complaint via the Resolution Procedure. Further information on the behavioural expectations of colleagues can be found in the Conduct Rules Policy.

Alternatively, you can raise your concerns via the Work in Confidence system at <https://speak2us.at/newcastle> (note you may need to use the Google Chrome browser). More information can be found in the Whistleblowing Policy.

6. Applying this policy throughout the colleague lifecycle

6.1 Talent Attraction

We seek to attract applications from a diverse talent pool that reflects the communities in which operate. We will ensure that all applicants are treated fairly at every stage of the recruitment and selection process and will make reasonable adjustments to accommodate individual requirements. For additional information please look at our Recruitment Policy.

6.2 Talent Development

We are committed to ensuring that our training is fully accessible and inclusive and that decisions made about selection for training and how that training will be delivered are based on individual needs.

We will make reasonable adjustments to accommodate individual requirements, to ensure that we facilitate equitable access to training.

We will use data and insight to shape initiatives to address areas of underrepresentation as part of our succession planning process.

6.3 Talent Management

All decisions made about your promotion and career development are based on merit and focus on your skills and talents regardless of any protected characteristics you may have.

6.4 Performance Management

As part of the Performance Review Framework, you will receive ongoing feedback on your performance based on your agreed goals, objectives and behaviours. We want an open and honest feedback culture which will enable us to create a high performing culture. We will also work to ensure that you receive the reasonable adjustments you need to accommodate your individual requirements.

6.5 Reward & Recognition

We operate a Total Reward approach to your pay and benefits. Decisions made about reward are made regardless of protected characteristics and will be based on inclusive principles to meet the needs of colleagues at different stages of their personal lives. For additional information please look at our Remuneration & Reward Policies.

6.6 Diversity Data

We collect colleague's diversity data, and this is stored confidentially within our HR database, CIPHR, and is not accessible by line managers. This data is used continuously to review our internal demographic and the information is treated in the strictest confidence. It helps us to identify areas where we should be focusing our efforts and developing initiatives. It is also essential to help us measure our progress towards a more diverse, equitable and inclusive workplace.

We encourage all colleagues to help us by completing the personal details section on CIPHR and updating this data when necessary. You can review and update your data at any time. Further details of how we process Special Category Data can be found in the Colleague, Worker & Contractor Privacy Notice on The Bridge.

7. Other relevant policies

- Conduct Rules Policy
- Dignity at Work Policy
- Recruitment Policy
- Remuneration Policy
- Reward Policy

- Resolution Policy
- Disciplinary Policy
- Whistleblowing Policy