

Niburu Recordings Ltd

Equality, Diversity & Inclusion Policy

April 2026

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1. Introduction

Our Mission Statement

Niburu Recordings Ltd is committed to upholding equality, diversity and inclusion for all people, at all times. EDI principles underpin the framework of Niburu's core values and are reflected throughout our projects and business structure. Niburu embraces an inclusive workplace culture, upholding diversity throughout its employees and leadership team.

Our Vision

Niburu Recordings Ltd supports promotion of the vibrant 'living culture' of EDI, where all are equally respected and afforded equal opportunity to thrive. Embedded at the core of this vision is a holistic approach to EDI's development through a combination of structured planning, ongoing monitoring, regular review, training, sharing and learning.

Policy Objectives

The policy will provide access and guidance to the firm foundation on which Niburu's EDI principles are built:

- **Encouraging an inclusive and accessible culture for everyone:** Ensuring that all clients, staff and partnership organisations work in a climate of equality, accessibility and respect.
- **Ensuring a culture of ongoing policy review is undertaken:** Ensuring Niburu's CEO and Trustees ensure EDI principles for continuous development form part of a 'living culture'. Setting structured internal management systems to monitor Niburu's performance.
- **Providing a code of conduct for staff and partnership organisations:** Ensuring all employees, trustees and volunteers understand the responsibility for appropriate behaviour and uphold the policy.
- **Providing a policy of inclusive recruitment:** Ensuring no applicant or employee receives less favourable treatment in all aspects of recruitment, reward structure, performance reviews and assistance in career development. Ensuring selection criteria and procedures will be monitored and regularly reviewed.
- **EDI in artistic programming and partnerships:** Niburu Recordings Ltd recognises that EDI principles extend beyond internal employment matters. We are committed to ensuring that our artistic programming, collaborations and external partnerships reflect and celebrate diversity and inclusion.

2. Policy Statements

Niburu Recordings Ltd maintains an ongoing practice of:

- **Equal opportunities:** Commitment to fairness in recruitment, training and all areas of engagement with employees, clients and stakeholders.
- **Anti-discrimination:** Niburu Recordings exercises zero tolerance for any form of discrimination.
- **Diversity Promotion:** Through ongoing monitoring and review of diversity within the company, strategies are undertaken to increase diversity at all levels.
- **Inclusion initiatives:** Through consultation with staff, stakeholders and clients, Niburu Recordings will implement relevant programmes and strategies to ensure all feel included and valued.
- **Accessibility:** We uphold a commitment to ensure our projects will be accessible for all.

3. Scope

The policy covers:

- All Niburu Recordings Ltd employees, trustees and volunteers: observing adherence to the policy's objectives and guidance at all times.
- Clients, collaborators, and stakeholders: Niburu Recordings will develop EDI principles through engagement and advocacy.
- The principle of EDI will be observed at all times by employees, trustees and volunteers when representing Niburu Recordings Ltd.

4. Data Protection & GDPR

[NEW SECTION: Added to address data governance around diversity monitoring]

Any personal data collected in connection with diversity monitoring — including information relating to protected characteristics — will be handled in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

- Diversity monitoring data will be collected anonymously wherever possible.
- Data will be stored securely within Niburu's internal management system and accessible only to authorised personnel.
- Data will be used solely for the purposes of monitoring, reviewing and improving EDI outcomes within the organisation.
- Individuals have the right to access, correct or request deletion of their personal data in line with applicable legislation.
- Niburu Recordings Ltd will not use diversity data in any way that identifies individuals or disadvantages any person.

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5. Responsibilities

- The Chief Executive Officer/Manager and the Trustees of Niburu Recordings Ltd have ultimate responsibility for the effectiveness of the policy.
- Employees, volunteers and others associated with Niburu Recordings Ltd all have a responsibility to ensure their actions comply with the policy.
- Communications with stakeholders and clients demonstrate Niburu's commitment to EDI.

Employer Responsibilities

- Responsibility for the implementation of the policy is delegated by the Board of Trustees to the Chief Executive/Manager on a day-to-day basis.
- That person will bring this policy to the attention of all employees and volunteers.
- Training, as appropriate, will be given to support the policy and its implementation.
- Procedures and selection criteria will be regularly reviewed for the avoidance of direct and indirect discrimination.
- Niburu Recordings Ltd has a duty of care to all employees which includes protection from harassment in the workplace.
- The organisation will not tolerate harassment of or by any employee and will take measures to handle such issues.

Employee Responsibilities

- It is the responsibility of all employees and volunteers to promote and observe the equal opportunity policy and diversity-appreciative practices in all their dealings with internal and external contacts of Niburu Recordings Ltd.
- Failure to comply could result in disciplinary action being brought, which could include dismissal from Niburu Recordings Ltd.
- Employees who consider they have been subject to harassment or discrimination should formally ask the person responsible to stop the behaviour and explain that it offends or makes them feel uncomfortable and is interfering with their work.
- If the behaviour continues, formal proceedings should be started by raising a grievance with the line manager or Chief Executive Officer. Where the employee causing the disruptive behaviour is the Chief Executive, the formal grievance should be raised with the Chair of the Board of Trustees.
- All complaints will be investigated.

6. Definitions

There are two forms of discrimination: direct and indirect.

Direct Discrimination

- Direct discrimination occurs when a person discriminates against another person by treating them less favourably than they treat or would treat someone else, because of a protected characteristic.

Indirect Discrimination

- Indirect discrimination occurs when a person applies selection criteria, policies, benefits, employment rules or any other practices which, while appearing neutral, would result in certain groups being put at a disadvantage because of a protected characteristic.

Protected Characteristics (Equality Act 2010)

The following characteristics are protected under the Equality Act 2010:

- **Age:** Protection from discrimination for people of all ages — both younger and older individuals — in contexts such as employment, education and access to goods and services.
- **Disability:** Covering physical or mental impairments that have a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities. This includes visible disabilities as well as hidden conditions such as mental health issues, learning difficulties and chronic illnesses. Protection also covers past disabilities or perceived disabilities.
- **Gender reassignment:** Protecting transgender individuals who are proposing to undergo, are undergoing, or have undergone a process to reassign their sex. This does not require medical intervention and can be purely social. Protection begins from the moment a person decides to live in their preferred gender identity.
- **Marriage or civil partnership:** Protection for people who are married or in a civil partnership from discrimination, particularly in employment.
- **Pregnancy or maternity:** Protecting women from unfair treatment due to pregnancy, pregnancy-related illness, or taking (or seeking to take) maternity leave. Protection extends to breastfeeding mothers in some contexts.
- **Race:** Including colour, nationality and ethnic or national origins. Protection extends to discrimination based on perceived race, even if that perception is incorrect.
- **Religion or belief:** Covering any religious or philosophical belief, as well as a lack of belief. This includes mainstream religions and smaller sects, as well as non-religious beliefs such as humanism or atheism.
- **Sex:** Protecting both men and women from discrimination based on their sex. This covers direct and indirect discrimination, as well as issues such as equal pay and conditions of employment.

- **Sexual orientation:** Protecting people from discrimination based on their sexual attraction towards people of the same sex (lesbian or gay), the opposite sex (heterosexual), or both sexes (bisexual). This covers perceived sexual orientation and discrimination by association.
- **Neurodiversity:** While neurodiversity (including conditions such as autism, ADHD, dyslexia and dyspraxia) may be covered under the disability characteristic in law, Niburu Recordings Ltd is committed to recognising and actively supporting neurodiverse individuals. We will take steps to provide appropriate adjustments and create an inclusive environment for all.

7. Types of Discrimination

Harassment

Harassment is defined as unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading or offensive environment.

Niburu Recordings Ltd will not allow harassment of employees by anyone, including members of the public.

Common forms of harassment include sexual, racial, gender-related and workplace harassment.

Sexual Harassment

Sexual harassment is a form of sex discrimination and is unlawful under the Equality Act 2010. Examples include:

- Verbal propositions, innuendo or suggestive remarks.
- Display of sexually offensive pictures, sexually suggestive gestures or written material.
- Physical touching, pinching or brushing against another person's body.
- Offensive or unwanted comments about appearance, clothes or personal characteristics.

Racial Harassment

Racial harassment is a form of race discrimination and is unlawful under the Equality Act 2010. Examples include:

- Abusive remarks or racist jokes.
- Graffiti or offensive gestures.
- Physical threats or assaults.

Workplace Harassment

Examples of workplace harassment include:

- Shouting or swearing at people in public or in private.

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- Persistent or unwarranted criticism.
- Ignoring or deliberately excluding people.
- Dispensing disciplinary action which is unjustified.
- Deliberately sabotaging or impeding another person's work.
- Removing areas of responsibility without explanation.
- Consistently imposing excessively demanding tasks with the expectation of failure.

8. Legal Framework

Niburu Recordings Ltd operates in compliance with the following legislation:

- The Equality Act 2010 — the primary legislation governing equality and non-discrimination in the United Kingdom, consolidating and replacing earlier Acts including the Sex Discrimination Act 1975 and the Race Relations Act 1976.
- The Human Rights Act 1998.
- The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- The Employment Rights Act 1996 (as amended).
- The Public Interest Disclosure Act 1998 (whistleblowing).

9. Implementation

Niburu Recordings Ltd will undertake the following to implement EDI within the organisation:

- **Training Programmes:** Induction training for new team members and periodic re-training for all staff and volunteers.
- **Awareness Campaigns:** Periodic campaigns to promote EDI within the company and the wider community.
- **Recruitment:** Review of selection criteria to support diversity within the company, with reference to monitoring data to ensure inclusive and unbiased selection.
- **Resource Allocation:** A dedicated resource budget to implement diversity initiatives.
- **Timelines:** An action plan to schedule the rolling out of identified policy improvements and amendments.
- **Benchmarking:** Data will be collected periodically and submitted for annual review. Recording will be embedded within the company's internal management system.
- **Neurodiversity Support:** Reasonable adjustments will be made to support neurodiverse employees, volunteers and clients on an individual needs basis.

10. Procedures

- **Recruitment:** Niburu Recordings seeks to encourage a diversity of candidates. Monitoring data will be referred to, ensuring an inclusive and unbiased selection process.

- **Continuing Professional Development:** Mentoring programmes will be made available to promote the development of EDI principles.
- **Accessibility:** Reasonable adjustments will be made on a needs basis where required.
- **Religious observance:** Where required, Niburu Recordings will support different religious practices.
- **Additional support:** Support will be provided where required (e.g. for clients with English as a second language).

11. Addressing Concerns

Reporting

- Concerns should be reported in the first instance to the Project Leader.
- Following initial enquiries, the report will be escalated to the Senior Reporting Officer.
- Should it be impractical to alert the Project Leader, contact can be made directly with the Senior Reporting Officer.

The Senior Reporting Officer is the designated role responsible for overseeing formal EDI complaints. This role is held by the Chief Executive Officer, or in cases involving the CEO, by the Chair of the Board of Trustees.

Formal Proceedings

- Niburu Recordings Ltd has in place procedures for dealing with complaints of discrimination and harassment, which are detailed in the Equal Opportunities Policy.

Confidentiality

- Confidentiality will be maintained at all times throughout any investigation or formal proceedings.

12. Whistleblowing Protection

[NEW SECTION: Added to reflect the Public Interest Disclosure Act 1998]

Niburu Recordings Ltd is committed to maintaining an open and transparent culture in which all employees, volunteers and trustees feel safe to raise genuine concerns about wrongdoing, including breaches of this EDI Policy.

- Any individual who raises a concern in good faith will be protected from retaliation or victimisation as a result of their disclosure.
- Concerns may be raised with the line manager, Chief Executive Officer, or the Chair of the Board of Trustees, as appropriate.

- Where an individual does not feel comfortable raising a concern internally, they may contact an external body such as the Advisory, Conciliation and Arbitration Service (ACAS) or the Equality and Human Rights Commission (EHRC).
- Malicious or vexatious reports made in bad faith will be dealt with through the organisation's disciplinary procedures.

13. Monitoring & Review

Niburu Recordings Ltd will undertake a formal review of the EDI Policy annually. A culture of ongoing review, encompassing all areas of policy, underpins Niburu's management framework for improvement.

How Review and Monitoring will be achieved

- Establish monitoring of job applicants, with information analysed to guide the recruitment process and provide data for review of diversity targets.
- Active monitoring and a formal annual review will be undertaken to assess engagement and ensure positive outcomes for equal opportunity.
- Consultation on policy will be undertaken with the project's young people's steering group, promoting involvement in the development of EDI within Niburu Recordings.
- Diversity monitoring data will be stored and processed in accordance with UK GDPR (see Section 4).
- Any material amendments to this policy will be communicated to all employees, trustees and volunteers in a timely manner.