

INTRODUCTION

This document sets out the Company's policy on equality and equal opportunities. This policy does not form part of your contract of employment but is a policy statement describing the way in which equal opportunities issues are dealt with in the Company.

The Company has introduced this equal opportunity policy as a commitment to make full use of the talents and resource of all its employees and to provide a healthy environment which will encourage good and productive working operations within the organisation. This document describes how the policy is to be applied throughout the Company.

The Company will ensure that all managers and supervisors are provided with the appropriate equality and equal opportunities training where necessary, which may be updated as required. Other staff may also be required to attend equal opportunities training. Attendance at training will be compulsory if you are notified that you should attend a course.

The Company will monitor the effectiveness of this policy to ensure that it is working in practice and will review and update this policy as and when necessary. All **Directors** and **Managers** must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities.
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This policy does not form part of any employee's contract of employment. We may amend it at any time and decide to follow a different procedure where we consider it appropriate.

STATEMENT OF PRINCIPLE

The Company is committed to a policy of treating all its employees, workers and job applicants equally. No employee or potential employee will receive less favourable treatment because of any 'Protected Characteristic', namely:

- age (or perceived age)
- disability (past or present)
- gender reassignment
- marriage or civil partnership status
- pregnancy or maternity
- race, colour, nationality, ethnic or national origins
- religion or belief
- sex
- sexual orientation
- trade union membership (or non-membership)
- part-time or fixed term status.

No employee or potential employee will be disadvantaged by any conditions of employment that cannot be justified as necessary on operational grounds.

The Company aims to encourage, value and manage diversity and is committed to equality for its entire staff. The Company wishes to attain a workforce which is representative of the communities from which it is drawn.

These principles of equality of opportunity and non-discrimination also apply to the manner in which our staff treat clients/customers, our business partners and visitors.

Employees are expected to work with the Company towards these aims. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

Other Company policies, such as those dealing with bullying and harassment, maternity, paternity, adoption, emergency time off for dependants and parental leave are set out in separate documents, copies of which are included in this handbook.

EQUALITY PRINCIPLES

There should be no discrimination, whether direct or indirect, because of any of the protected characteristics set out in the Company's statement of principle on equal opportunities contained above. The types of discrimination that are prohibited are explained below.

Discrimination may occur in the following forms:

1. **Direct Discrimination** — this is treating someone less favourably because of a protected characteristic. An example of this is paying someone less because of their sex or because they belong to a particular racial group. 'Because of' is very wide and includes less favourable treatment based on a perception of another person, for example that the person is gay, or is disabled, whether or not this perception is correct and even if the perpetrator knows that their perception is, in fact, wrong. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic.
2. **Indirect Discrimination** — this is treating people in the same way but in a way which adversely affects those with a protected characteristic. An example of this is telling all employees that they have to work late at night; although applied to everyone, it will adversely affect those employees with childcare responsibilities, and these tend to be women.
3. **Victimisation** — this is treating someone less favourably because they have asserted their right not to be discriminated against because of a protected characteristic. An example of this would be an employee claiming that they had been discriminated on the grounds of their disability and then their manager deciding when they left not to give them a reference because they had claimed disability discrimination.
4. **Harassment** — this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature or may occur because someone has harassed the victim and the victim either rejects or submits to it and, because of that rejection or submission, that person treats the victim less favourably. More information on what can constitute harassment is set out in the Company's bullying and harassment policy.

Disability discrimination: includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

The Company will appoint, train, develop, reward and promote on the basis of merit and ability.

Recruitment and Selection

Recruitment, promotion, and other selection exercises will be conducted on the basis of merit, involving objective criteria that avoids discrimination. Shortlisting is ordinarily done by more than one person and with the involvement of **Human Resources**, where reasonably practicable.

Any advertisements for jobs are prepared with a view to avoiding both unnecessary stereotyping or unnecessary wording that may discourage particular groups from applying.

Job applicants will not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants will not be asked about health or disability before a job offer is made unless an appropriate exception applies. There are limited exceptions which should only be used with the approval of **Human Resources**. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Where reasonably necessary, job offers can be made conditional on a satisfactory medical check.

The Company is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from UK Visas and Immigration.

The Company's conditions of service, benefits and facilities are reviewed to ensure that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them.

Disabilities

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you should contact **Human Resources** to discuss your difficulties and reasonable adjustments that would help overcome or minimise the difficulty (your suggestions on adjustments, for the Company to consider, are welcomed and encouraged). The Company may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

OVERALL

All employees have personal responsibility for the practical application of the Company's equality policy, which extends to the treatment of job applicants, employees (including former employees), customers/clients and visitors.

The principles set out in this policy apply:

- in the workplace
 - outside the workplace in a work-related context, such as on business trips, customer or supplier events or work-related social events
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Special responsibility for the practical application of the Company's equality policy falls upon the **Managing Director, Line Manager/Supervisors and Human Resources**, involved in the recruitment, selection, appraisal, promotion and training of employees and the way their terms of employment are fixed.

The Company's Grievance Procedure is available to any employee who believes that they may have been unfairly discriminated against. Please see the Employee Handbook for a copy of the Grievance Procedure. The harassment complaints procedure set out in the Company's Bullying and Harassment Policy is also available to any employee who believes that they may have been harassed or bullied and can also be found in the Employee Handbook. Employees will not be victimised in any way for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and as soon as possible.

Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment and bullying will be treated as gross misconduct. Unwarranted allegations that are not made in good faith may also be considered as a disciplinary matter. Confidential records of matters dealt with in accordance with this policy will be kept.

In the case of any doubt or concern about the application of this policy in any particular instance or situation, please consult **Human Resources** as soon as possible.

The Company will keep its policy, procedures and practices on equality and equal opportunities under review.
