

Equal Opportunities & Diversity Policy

1. Who is covered by the policy?

This policy covers all individuals working at all levels and grades, including (but not limited to) officers, directors, employees, consultants, contractors, trainees, interns, home workers, part-time and fixed-term employees, casual workers and agency staff (collectively referred to as staff in this policy).

2. Our Commitment

We are committed to providing equal opportunities to our staff, eliminating discrimination and encouraging diversity amongst our workforce. We will not tolerate unlawful acts of discrimination in respect of job applicants, employees, workers or our clients.

This policy is intended to ensure that everyone understands their obligations and assists the Company in putting its commitment to equal opportunities and diversity into practice.

We actively promote non-discriminatory behaviour. We will not tolerate any unlawful discrimination, and anyone found to be acting in such a way will face disciplinary action that could result in dismissal without notice for gross misconduct. Everyone has a duty to report any unlawful discrimination to a member of management.

We believe that treating people with dignity and respect is an important part of realising equal opportunities and diversity, and this policy should be read in conjunction with our harassment and bullying policy.

3. Our Aim

We aim to ensure that no job applicant, employee, worker or customer is discriminated against on the grounds of a protected characteristic. The following are protected characteristics:

- a) Age;
- b) Disability;
- c) Gender reassignment;
- d) Marriage and civil partnership;
- e) Pregnancy and maternity;
- f) Race (including colour, nationality, and ethnic or national origin);
- g) Religion or belief;
- h) Sex;
- i) Sexual orientation.

In addition, we aim to ensure that no job applicant, employee or worker is treated less favourably or placed at a disadvantage on the grounds of their part-time status or trade union activities.



This applies in the advertisement of jobs, recruitment, appointment, provision of benefits, allocation of training, promotion, disciplinary proceedings, dismissal, conditions of work, pay, giving a reference and every other aspect of employment.

4. Types of Unlawful Discrimination

The different types of discrimination are generally defined as follows:

- a) <u>Direct discrimination</u>: where a person is treated less favourably than another because of a protected characteristic.
- b) <u>Indirect discrimination</u>: where a provision, criterion or practice is applied that is to the detriment of people who share a protected characteristic when compared with people who do not and is not a proportionate means of achieving a legitimate aim.
- c) <u>Harassment</u>: where there is unwanted conduct in relation to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, regardless of the intention of the perpetrator.
- d) <u>Associative discrimination</u>: where a person is directly discriminated against because of their association with another person who has a protected characteristic.
- e) <u>Perceptive discrimination</u>: where a person is directly discriminated against or harassed based on a perception that they have protected characteristic even though they do not.
- f) <u>Victimisation</u>: where a person is subjected to a detriment because they have supported or raised a complaint under the Equality Act 2010 or are suspected of doing so.
- g) <u>Failure to make reasonable adjustments</u>: where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

5. Recruitment and Selection

Our objective is to recruit staff best able and qualified to perform the required or anticipated tasks.

The wording of any advertisements will not place unfair restrictions or requirements on a particular group or request specific qualifications that are not necessary for the effective performance of the job. All applications will be considered on the basis of objective criteria, such as qualifications, experience and ability to do the job.

Person specifications and job descriptions will only state requirements as necessary where they are essential for the job. Account will be taken of reasonable adjustments that may be required for applicants with disabilities.

The selection processes used will measure the suitability of the applicant in terms of the requirements for the position. Selection criteria and procedures will be kept under review



to ensure that individuals are selected and promoted on the basis of relevant merits and abilities.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees must be able to produce original documents (such as a passport) before employment starts.

6. Staff Training and Promotion

All employees will be given equality of opportunity and will be encouraged to progress within the Company.

We are committed to maintaining high standards of training and personal development strictly in the context of this policy on equal opportunities. Training will not be refused on an unlawful basis.

Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.

Equal opportunities and diversity training will be provided to all new employees as part of the induction process. Managers will be given training on equality and diversity in recruitment, selection, training, promotion, discipline and dismissal.

7. Discipline and Dismissal

We aim to ensure there is no discrimination in our disciplinary or redundancy processes and will examine procedures and criteria to ensure that discrimination is not taking place. The Company regularly monitors the decisions being made.

8. Disability Discrimination

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 may wish to contact your manager or the HR Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your manager and/or HR may wish to consult with you and your medical adviser(s).

9. Breaches of the Equal Opportunities & Diversity Policy

If you are an employee and you believe that you may have been discriminated against or harassed, you are encouraged to raise the matter through our Grievance Procedure. All other staff should raise a complaint in writing to HR.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result.

Gravity

False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary or other appropriate action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal.