

EQUAL OPPORTUNITIES POLICY

INTRODUCTION

The Company is an Equal Opportunities Employer.

It is the Company's belief that equal opportunities promotes fairness, increases morale, is good for relations and acknowledges the Company's most important resource, its employees.

Hence, we have produced this equal opportunities policy ("EOP") in line with the Equality Act 2010 (the "Act"). It is envisaged that the EOP will inform, guide and encourage equal opportunities within the Company. The EOP is a policy and therefore does not constitute part of your terms and conditions of employment.

Complaints about breaches of the EOP should be pursued through the Company's Grievance Procedures which can be found in the Staff handbook. We will treat breaches of the EOP seriously. Where appropriate, the Company will use its disciplinary procedures.

TYPES OF DISCRIMINATION (PROTECTED CHARACTERISTICS):

Age Discrimination covers discrimination on the grounds of a person's age whether because they are old or young, of a particular age or in a group of ages (for example in their fifties).

Sex Discrimination covers discrimination on the grounds of sex whether male or female.

Marriage/Civil Partnership discrimination covers discrimination on the basis of someone's marriage or civil partnership.

Gender Reassignment discrimination covers discrimination as a result of a person's gender reassignment (a process which is taken under medical supervision for the purpose of reassigning a person's sex by changing physiological or other characteristics of sex).

Race Discrimination covers discrimination on the grounds of race, colour, ethnic or national origin, or nationality.

Sexual Orientation covers discrimination on grounds of a person's sexual orientation towards persons of the same sex, the opposite sex; or both sexes.

Religion covers discrimination on the grounds of perceived as well as actual religion or belief and the religion or belief of someone with whom the person associates.

Disability Discrimination covers discrimination against someone who has a disability which amounts to a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities.

TYPES OF DISCRIMINATION

There are broadly four types of discrimination under the Act (other than in relation to disability discrimination where other forms also apply). They are direct discrimination, indirect discrimination, victimisation and harassment. Unlawful discrimination will not be condoned or tolerated within the Company.

Direct Discrimination

This occurs where someone with one of the Protected Characteristics above (e.g. women, people of a certain race or disabled people) is treated less favourably than a person without that Protected Characteristic because they have that particular Protected Characteristic.

For example the dismissal, or other less favourable treatment, of a woman because she is pregnant or has been on maternity leave is likely to constitute direct discrimination.

Indirect Discrimination

This may occur where a requirement or condition is imposed which appears to apply equally, but in reality, does not because it disadvantages people with a Protected Characteristic more than people without the Protected Characteristic; and it cannot be shown to be a justifiable means of achieving a legitimate aim.

For example, a Company policy which prohibits any items being worn on wrists would indirectly discriminate against Sikhs who wear steel or iron bracelets called karas for religious reasons.

There may however be a legitimate Health and Safety concern which could make this requirement a justifiable means of achieving a legitimate aim.

Victimisation

This occurs when an individual is subjected to a detriment because he/she has made an allegation or brought proceedings under the relevant discrimination legislation or has given evidence in relation to discrimination proceedings.

Harassment

Harassment involves unwanted conduct that has the purpose or effect of violating a person's dignity or creating an offensive, intimidating or hostile environment. It is discriminatory harassment if it is related to qualifying Protected Characteristics.

Disability Discrimination

If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible. You may also wish to advise your Line Manager or the People Team of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties.

Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job. Nevertheless, there may be circumstances where it will not be reasonable for us to accommodate suggested adjustments and we will ensure that we will explain the reasons for our decision not to make any adjustments.

We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where possible and proportionate, we will take steps to improve access for disabled staff and service users.

The Company also recognises its obligation to make reasonable adjustments to the workplace and to its employment procedures to assist applicants or employees. The Company will discuss individual needs and, where appropriate, take expert advice. Adjustments that the Company may consider include:

- i (i) rearranging the office set-up;
- ii (ii) allocating some of the disabled person's duties to another person;
- iii (iii) altering the disabled person's hours of work;
- iv (iv) allowing the disabled person time for rehabilitation, assessment or treatment;
- v (v) giving the disabled person training;
- vi (vi) acquiring special equipment or modifying existing equipment;

We acknowledge the difficulties disabled people face in securing employment. When considering disabled people for a job, we will always consider what the person can do and not what he or she cannot do.

We shall, as far as practicable, provide help and assistance to any existing employee who becomes disabled and wishes to remain in employment with the Company.

EMPLOYMENT PRACTICES

The EOP and the legislation on discrimination apply to all stages of employment, right from the recruitment for a job to the end of employment.

Recruitment

It is important that we all guard against possible discrimination based on assumptions and pre-conceptions about individuals who belong to a particular group or who have a disability.

Where employment agencies or head-hunters are used to recruit employees, they should be informed that the Company is an Equal Opportunities Employer.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with People Team approval. For example;

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

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning a Protected Characteristic without the approval of the People Team (who should first consider whether such matters are relevant and may lawfully be taken into account).

Interview questions should be limited to those that relate to the suitability of the applicant. Irrelevant and potentially discriminatory questions should be avoided. Information required for personnel records should be obtained after a job offer has been accepted.

The selection of a new recruit should be made according to a set of objective criteria and should only consider the applicant's suitability for the job in question. Reasons for decisions whether or not to appoint applicants should be recorded.

Fixed Term Employees & Agency Workers

We monitor our use of fixed term employees and agency workers and their conditions of service to ensure that they have appropriate access to benefits, training, promotions and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

Part time Workers

We monitor the conditions of service of part time employees and their progression to ensure that they are being offered appropriate access to benefits, training and promotion opportunities. We will ensure a request to alter working hours is dealt with appropriately under our flexible working policy.

Promotion

The assumptions and pre-conceptions, which must be guarded against in the recruitment procedure apply equally to decisions about promotion.

Terms and Conditions of Employment

The terms and conditions of employment must not discriminate against certain groups.

Harassment

All employees have a right to be treated with dignity. Harassment at work will not be permitted or condoned and employees have a right to complain about it should it occur. There is a separate policy on this subject, please refer to the "Bullying and Harassment Policy" in the Staff Handbook.

RESPONSIBILITY FOR POLICY AND COMPLAINTS

The People Team Director will be responsible for the EOP. All questions about it should be directed to her.

The Company will appoint the Managing Director and a senior employee of the opposite sex to the Managing Director as a responsible person to whom people aggrieved about discrimination; harassment or victimisation can speak informally.

Monitoring

All aspects of employment mentioned above will be kept under review to ensure that the EOP operates effectively. It will also be reviewed periodically to see what changes need to be made.

Equal Pay

We acknowledge our responsibilities in respect of Equal Pay. Pay rates throughout the Company will be reviewed from time to time to ensure that equal pay is being paid for work of equal value unless there is a genuine material factor that accounts for the variation.

Training and Publicity about the EOP

The EOP shall be made available to all employees. Members of management and anyone involved in personnel matters (including recruitment) are kept informed to ensure that they are aware of and implement the EOP.

This policy applies to the treatment of our visitors, clients, customers, suppliers and former employees by our staff and to the treatment of our staff by these third parties.