

## EQUALITY, DIVERSITY & INCLUSION POLICY

### Statement

The Company aims to be an equal opportunity employer. It is committed to ensuring that all employees are treated fairly and with dignity and respect. The Company aims to ensure that no employee is treated less favourably on the grounds of their sex, race, colour, religion, nationality, ethnic origin, sexual orientation, disability, marital or part-time status without justification.

This policy applies to all the aspects of the employment relationship including, vacancy advertising, selection, recruitment, promotion, training, transfer, dismissal, as well as conditions of employment including remuneration, grievance and disciplinary procedures.

This policy also applies to the recruitment of persons from outside of the workplace and the treatment of contract workers.

The Company will recruit employees and make other employment decisions concerning promotion, training etc., on the basis of objective criteria.

### Types of Discrimination

Direct Discrimination occurs when a person is subjected to less favourable treatment on the grounds of their sex, race, colour, religion, nationality, ethnic origin, sexual orientation, disability, marital or part-time status.

Indirect Discrimination occurs when a requirement or condition is imposed, with which a considerably smaller number of those of a certain sex, race, colour, religion, nationality, ethnic origin, sexual orientation, disability, marital or part-time status can comply, and as a result they suffer a detriment.

Victimisation occurs where a person is treated less favourably by virtue of action they have taken or are proposing to take, or any complaint they have made or are proposing to make in connection with their statutory rights.

Harassment occurs when a person is subjected to unwanted conduct that has the purpose or effect of (a) violating the person's dignity, or (b) creating an intimidating, hostile, degrading, humiliating or offensive environment.

### Organisation

The person responsible for the effective operation of the Company's Equal Opportunities Policy is Katy Falconer.

### Employees' liability

Employees have a personal responsibility not to practice, induce or encourage any form of discrimination against applicants for employment or their fellow employees. Failure to comply with this policy will result in disciplinary action being taken against the employee in question.

Employees should be aware that in certain circumstances if they are guilty of discrimination they may be personally liable for their actions in a court of law.

The Company also asks any employee to report any suspected or actual discriminatory acts to the person responsible for this policy who will take the appropriate action.

## Policy

### 1. Advertising vacancies

- 1.1 Wherever possible, all vacancies shall be advertised simultaneously, internally and externally
- 1.2 Wherever possible steps shall be taken to ensure that knowledge of the vacancies reaches unrepresented groups internally and externally, by notifying job centres, careers office, schools, colleges, universities, etc., with significant minority group rolls, as well as minority press/media.
- 1.3 All vacancy advertisements shall include an appropriate short statement on equal opportunities and identify the Company as an equal opportunity employer.

### 2. Recruitment and Selection

- 2.1 Selection criteria, i.e. job description and employee specification shall be kept under review to ensure that the criteria are justifiable and non-discriminatory and are essential for the effective performance of the job
- 2.2 Wherever possible, more than one person should be involved in the selection interview and recruitment process and all should have received training in equal opportunities.
- 2.3 Individual Candidates shall be assessed according to their capability to carry out a given job. Questions should relate to the requirements of the job. If it is necessary to assess whether personal circumstances may affect job performance, this should be done objectively.
- 2.4 Assumptions that only certain types of person will be able to perform certain types of work should not be made.
- 2.5 Recruitment solely or primarily by word of mouth should be avoided if its effect is, or may be, to prevent certain types of person from applying.
- 2.6 Where the Company's arrangements for recruitment and selection put disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements shall be made to eliminate or if that is not reasonably practicable, reduce the disadvantage unless objectively justified.
- 2.7 Written records of interviews and reasons for appointment and non-appointment should be kept.

### 3. Promotion, transfer and training

- 3.1 Assessment criteria and appraisal schemes shall be kept under review to ensure that they are non-discriminatory and can be genuinely justified.
- 3.2 Unrepresented groups will be encouraged to apply for training and employment opportunities.
- 3.3 If necessary, special training shall be provided for such groups to prepare them to compete on equal terms for jobs and promotion.
- 3.4 All promotions or transfers will be made strictly on merit.

- 3.5 Any training provided will be strictly for proper performance of the employee's role.
- 3.6 Promotion and career development patterns will be monitored to ensure that access is not being unjustifiably restricted or excluded to particular groups of workers.
- 3.7 Wherever possible efforts will be made to identify and remove unnecessary and/or unjustifiable barriers and provide appropriate facilities to meet the special needs of disadvantaged and/or unrepresented groups of workers.
- 3.8 Where the Company's arrangements in relation to promotion, transfer or training put disabled workers at a substantial disadvantage for a reason connected with their disability, reasonable adjustments to the arrangements shall be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless objectively justified.

#### **4. Terms of employment, benefits, facilities and services**

- 4.1 The terms of employment, benefits, facilities and services available to workers shall be kept under review to ensure that they are provided in a way that is non-discriminatory and do not place particular groups of workers at a disadvantage.
- 4.2 Part-time workers shall receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified.
- 4.3 Where the Company's arrangements relating to terms of employment, benefits, facilities, and services put disabled workers at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements shall be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless otherwise objectively justified.

#### **5. Personnel Records**

- 5.1 In order to ensure the effective operation of the equal opportunity policy records shall be kept of all employee's and job applicants' gender, racial origins and disability.
- 5.2 Where necessary, employees will be able to check/correct their own records.
- 5.3 With the exception of 5.2 above, access to this information will be strictly restricted to assessing the effective operation of this policy. The records will not be released to any third party, unless required or permitted by law, without the employees express consent.
- 5.4 The records will be analysed regularly and appropriate follow-up action taken if necessary.

#### **6. General**

- 6.1 The Company shall ensure that all manager and supervisors are provided with appropriate equal opportunities training which is updated as necessary.
- 6.2 This policy will be regularly reviewed and updated if necessary to ensure it is working in practice.
- 6.3 The Company will ensure that this policy is known to all its employees and where applicable, job applicants.

6.4 Any complaints regarding the operation of this policy, or any other matters relating to equal opportunities within the Company shall be investigated through the Company's internal Grievance Procedures.

6.5 Failure by an employee to comply with any aspect of the Equal Opportunities Policy, procedures or rules will be regarded as misconduct which will be dealt with under the Company's Disciplinary Procedure.

**Signed**



**Name**

Steve Saunders, Group Business Development Director

**Date**

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