

EQUAL OPPORTUNITIES POLICY

1. EQUAL OPPORTUNITIES STATEMENT

1.1 We are fully committed to providing equal opportunities in employment, and to eliminate unlawful and unfair discrimination in employment. We aim to create a culture that encourages and values diversity, and that appoints, rewards, and promotes staff based on merit.

1.2 Everyone will be treated equally regardless of any 'Protected Characteristics', namely:

- (a) age;
- (b) disability;
- (c) gender reassignment;
- (d) marriage or civil partnership status;
- (e) pregnancy or maternity;
- (f) race (including colour, nationality and ethnic or national origin);
- (g) religion or belief;
- (h) sex; or
- (i) sexual orientation.

1.3 Equally, we will not treat anyone less favourably because:

- (a) they are (or are not) a trade union member;
- (b) they work part-time or on a fixed-term basis; or
- (c) they have caring responsibilities.

2. ABOUT THIS POLICY

2.1 This policy sets out our commitment and approach to ensuring that all staff and job applicants have equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

2.2 This policy covers all employees, officers, consultants, contractors, volunteers, apprentices, casual workers, agency workers and job applicants.

2.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2.4 This policy should be considered alongside other Company policies, such as those dealing with harassment and bullying, family leave (maternity, paternity, adoption, shared parental, parental), emergency time off for dependants, disciplinary and grievance.

3. RESPONSIBILITY

3.1 Our board of directors have overall responsibility for the effective operation of this policy.

3.2 All 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 about equal opportunities.

3.3 All staff are responsible for ensuring that there is no discrimination in the workplace and for ensuring that this policy is applied on a day-to-day basis. All staff are also expected to apply the principles of equal opportunities and non-discrimination in their interactions with customers, suppliers, business partners and visitors.

3.4 In certain circumstances, individuals can be personally liable for discrimination against a fellow colleague or a job applicant.

4. TRAINING

4.1 All staff will receive appropriate training on equality and diversity.

4.2 We will ensure that managers and supervisors with responsibility for managing staff are provided with training on how to manage equality and diversity issues in the workplace.

5. DISCRIMINATION

5.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers, and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers, or other work-related contacts), and on work-related trips or events including social events.

5.2 The following forms of discrimination are prohibited under this policy and are unlawful:

(a) **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay, or paying someone less because of their race or sex.

(b) **Indirect discrimination:** this involves treating a group of people in the same way in accordance with a provision, criterion or practice but in a way which

adversely affects people with a particular Protected Characteristic more than others, and which is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

- (c) **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. An example of this would be an employee being denied a reference by their manager because they had previously complained of discrimination.
- (e) **Disability discrimination:** this 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.

6. RECRUITMENT AND SELECTION

- 6.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted based on merit, against objective criteria that avoids discrimination. Where appropriate, shortlisting should be done by more than one person and with the involvement of the Human Resources Department where possible.
- 6.2 Our recruitment procedures are reviewed regularly to ensure that individuals are treated based on their relevant merits and abilities.
- 6.3 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage groups from applying.
- 6.4 We take steps to ensure that our vacancies are advertised to a diverse labour market.
- 6.5 Job applicants should 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.
- 6.6 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may

be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

6.7 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, 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 the Human Resources Department or UK Visas and Immigration.

6.8 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we may monitor applicants' ethnic group, gender, disability, sexual orientation, religion, and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

7. TRAINING, PROMOTION AND CONDITIONS OF SERVICE

7.1 Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made based on merit.

7.2 Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

7.3 Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

8. TERMINATION OF EMPLOYMENT

8.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

8.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

9. DISABILITIES

9.1 For the purpose of this policy, a disability is a physical or mental impairment that has a substantial and long-term effect upon a person's ability to carry out normal

day-to-day activities. There is no definitive list of what condition amounts to a disability, save that Cancer, HIV infection and Multiple Sclerosis are disabilities from the point of diagnosis.

- 9.2 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.
- 9.3 If you experience difficulties at work because of your disability, you may wish to contact the Human Resources Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Human Resources Department 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.
- 9.4 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.

10. PART-TIME AND FIXED-TERM WORK

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

11. BREACHES OF THIS POLICY

- 11.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- 11.2 If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or through our Anti-harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- 11.3 There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.