

## **Equal Opportunities Policy**

### **1. Policy Statement**

1.1 The Company is committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

1.2 We do not discriminate against staff on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age (protected characteristics).

1.3 The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

1.4 All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status. Your attention is drawn to our separate Anti-Harassment and Bullying Policy.

1.5 This policy does not form part of any employee's contract of employment and may be amended at any time.

### **2. Who is Covered by the Policy?**

2.1 This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed term employees, casual workers and agency staff (collectively referred to as staff in this policy).

### **3. Who is Responsible for this Policy?**

3.1 The Executive Chairman and Group Financial Director have overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law.

3.2 Day-to-day operational responsibility, including regular review of this policy, has been delegated to the Deputy Company Secretary ("the DCS").

3.3 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 with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice. The DCS has overall responsibility for equal opportunities training.

3.4 If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact the DCS to request training or further information.

#### **4. Scope and Purpose of the Policy**

4.1 This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

4.2 We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

#### **5. Forms of Discrimination**

5.1 Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

5.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

5.3 Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage.

5.4 Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that 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.

5.5 Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported someone else's complaint.

#### **6. Recruitment & Selection**

6.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants (if applicable) should be done by more than one person wherever possible.

6.2 Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying.

6.3 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 the approval of the DCS. 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).

6.4 Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of the DCS (who should first consider whether such matters are relevant and may lawfully be taken into account).

6.5 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 DCS.

## **7. Staff Training, Promotion & Conditions of Service**

7.1 Staff training needs will be identified through consultation with individual employees. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

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

## **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. Disability Discrimination**

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

9.2 If you experience difficulties at work because of your disability, you should discuss with your Manager any reasonable adjustments that would help overcome or minimise the difficulty. Your Manager and/or the DCS may wish to consult with you and your medical adviser(s) 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.

9.3 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 reasonable, we will take steps to improve access for disabled staff and service users.

## **10. Fixed-term Employees and Agency Workers**

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

## **11. Part-time work**

11.1 We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately.

## **12. Breaches of this policy**

12.1 If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure which can be found in the Grievance and Disciplinary Policy. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-Harassment and Bullying Policy. If you are uncertain which applies or need advice on how to proceed you should speak to your Manager or the DCS.

12.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure as set out in the Grievance and Disciplinary Policy.

12.3 Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.