

Equal Opportunities Policy

AIM & SCOPE

This Equal Opportunities Policy sets out our commitment to ensuring that all employees and job applicants are treated fairly and equally and to providing a working environment that is free from all forms of discrimination.

The policy applies to anyone and everyone employed, or seeking to be employed, by the Company whether permanent or temporary, full-time or part-time, agency staff or contractor.

If you are unclear about the effect or meaning of any part of this policy, you should seek clarification from HR.

This policy does not form part of employees' contracts of employment and the Company reserves the right to amend it at any time.

OUR POLICY

The Company will comply with the following enactments or Codes of Practice in relation to equal opportunities;

- Equality Act 2010 and associated secondary legislation
- Equal Pay Act 1970
- Equal Pay (Amendment) Regulations 2003
- The Commission for Racial Equality's Code of Practice for Employment
- Human Rights Act 1998
- The Employment Act 2002
- Work and Families Act 2014

The Company is committed to ensure that no employee or job applicant is treated unfairly because of age, disability, gender, gender reassignment, marital or civil partnership status, pregnancy or maternity, race including colour, ethnic or national origins and nationality, religion or belief or sexual orientation (the "protected characteristics" as defined under the Equality Act 2010).

We will not tolerate discrimination or harassment and aim to create a working environment that is free from such acts in any form and in which all employees, customers and suppliers are treated with dignity and respect.

Any employee who is found to have discriminated against or harassed any fellow employee, contractor, customer or supplier, or breached this policy in any other way, will be subject to disciplinary action under the Company's Disciplinary Policy and Procedure, which could result in summary dismissal.

Any non-employee, including contractors and agency staff, who is found to have discriminated against or harassed any employee, contractor, customer or supplier, or breached this policy in any other way, will be subject to appropriate formal action that may, depending on the circumstances, result in the termination of any contract, agreement or temporary employment.



The Company will not unlawfully discriminate in the arrangements we make for recruitment and selection or in the opportunities afforded for employment, training or any other benefit. All decisions will be made fairly and objectively based on personal merit, performance and the application of criteria which relate to the duties and conditions of each particular post and the needs of the Company.

If we know that an employee or applicant is disabled, as defined within the Equality Act 2010, we will make reasonable adjustments to help them in the recruitment process and in the course of their employment.

This policy will be published widely to all employees and to job seekers and applicants upon request.

A briefing on the policy will be given to new employees as part of our induction process.

The policy will be monitored and reviewed annually.

SPECIFIC RESPONSIBILITIES

The Managing Director is responsible for the overall implementation of the policy within the Company.

HR is responsible for monitoring and reviewing the policy and to provide equality and diversity training for employees and design guidance for managers to help them respond appropriately to the diverse needs of their staff.

Managers are responsible for implementing the policy and must ensure that no discrimination, abuse or harassment occurs in the workplace but report any such incidents for investigation as appropriate.

All employees are responsible for;

- co-operating with any measures introduced to ensure equality of opportunity
- reporting any discriminatory acts or practices
- not inducing, or attempting to induce, others to practice unlawful discrimination
- not victimising anyone as a result of them having reported or provided evidence of discrimination
- not harassing, abusing, bullying or intimidating others
- reading, understanding and complying with this policy.

COMPLAINTS

Any employee who considers that they have been a victim of discrimination or harassment by the Company, its employees, customers, contractors or suppliers on any grounds whatsoever should raise the matter in accordance with the Company's Grievance Procedure.

DEFINITIONS

- **Protected Characteristics:** age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender, sexual orientation
- **Direct Discrimination:** results from treating a person that has a protected characteristic less favourably than others who do not have a protected characteristic
- **Associative Discrimination:** is direct discrimination against someone because they associate with another person who possesses a protected characteristic



- **Perceptive Discrimination:** is direct discrimination against an individual because others think they possess a particular protected characteristic
- **Indirect Discrimination:** arises where a condition or requirement, although applied equally to everyone whether they have a protected characteristic or not, has the effect of excluding, penalising or treating less favourably any persons having a protected characteristic and which cannot be shown to be justifiable
- **Victimisation:** occurs if a person is given less favourable treatment than others because the individual has exercised their rights under this policy or relevant legislation, gives evidence or information in connection with a complaint under this policy or relevant legislation or makes an allegation that this policy or relevant legislation has been, or is being, contravened
- **Harassment:** unwanted conduct related to any protected characteristic which has the purpose, or effect, of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person
- **Bullying:** is offensive, malicious or insulting behaviour and abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure a person
- **Disability:** a physical or mental impairment that has been medically or clinically diagnosed as having a 'substantial' (more than minor or trivial) and 'long-term' (12 months or more) negative effect on a person's ability to perform normal daily activities

EXAMPLES OF UNACCEPTABLE BEHAVIOURS

Unacceptable behaviour includes, but is not limited to;

- **Harassment**
 - insulting or malicious remarks, particularly on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender, sexual orientation
 - unwanted physical conduct such as touching, pinching, pushing, brushing past someone, invasion of personal space, grabbing, shoving, punching, physical assault and sexual assault
 - unwelcome sexual behaviour such as unwanted suggestions, advances, propositions or pressure for sexual activity
 - continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome
 - the sending or displaying of pornographic, obscene or offensive material
 - offensive or intimidating comments or gestures
 - insensitive jokes or pranks
 - ignoring or shunning someone such as deliberately excluding them from a conversation or a workplace social activity
 - victimisation
- **Bullying**
 - verbal abuse such as shouting or swearing at someone
 - personal insults and spreading malicious rumours
 - constant humiliation or ridicule
 - intimidating or threatening behaviour



- excessive supervision and unwarranted monitoring
- being excessively critical about things with malicious intent
- persistently devaluing a person's effort
- constantly ignoring someone's opinions
- deliberately withholding information so as to cause difficulty or embarrassment
- setting impossible targets and objectives or constantly changing targets for no justifiable reason
- unreasonably blocking requests for leave
- aggressive communications

DATA PROTECTION

Information collected for monitoring purposes will be treated in the strictest of confidence. The Company processes any personal data collected in accordance with its data protection policies. Data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of monitoring. Inappropriate access or disclosure of employee data constitutes a data breach and must be reported in accordance with the Company's General Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the Company's Disciplinary Policy and Procedure.

Ray Colston
Managing Director

