

EQUALITY AND DIVERSITY POLICY

Introduction

As a business, we are committed to promoting diversity and providing equal opportunity to all areas of the business from recruitment, employment and career progression to learning and development.

We try to ensure that all applicants, employees, and workers receive equal treatment irrespective of 'The Protected Characteristics' which include their sex, marital or civil partnership status, sexual orientation, gender reassignment, race, colour, ethnic or national origins, religion or belief, disability or age.

We will not accept unlawful discrimination, victimisation or harassment and bullying and where applicable those responsible may be subject to disciplinary proceedings under the Company's disciplinary policy up to and including summary dismissal. They may also be accountable for their unlawful conduct which in some case may include criminal liability.

This policy is fully supported by the group board of directors as our aim is that our workforce should be truly representative of all sections of society and each person applying to be in the workforce and each person in the workforce feels respected. We strive to maintain a working environment free from discrimination, victimisation and harassment and bullying and ensure that people are employed based on their merits, skills and abilities which are required for the requisite role for which they are being considered.

As a business, we recognise the benefit of calling on the widest range of knowledge, skills and experience and we use a broad spectrum of recruitment advertising and methods of attraction (for example, press advertising, internet job sites, Jobcentre Plus, agencies) to try and reach all relevant potential applicants within the members of society and local community.

Scope

This policy is applicable to all employees (both salaried and hourly paid), workers (whether paid or unpaid), any contractors and applicants.

Responsibility

The responsibility for ensuring that this policy is upheld lies with Managers. Managers are responsible for knowing when unacceptable behaviour is occurring within their line of responsibility and they are required to take preventative measures to help ensure that there is always equality of opportunity and equal treatment for applicants, colleagues and workers in the same context when one has a protected characteristic and the other does not. Naturally, people will be treated differently where they are doing different things but this will never arise from their protected characteristic.

If a Manager becomes aware that people are not being treated equally arising from a protected characteristic then the manager will need to take action and raise the issue and so it can be investigated. It may ultimately become a disciplinary issue if an employee is at fault and has breached the procedure. If a worker has breached the procedure then action will be taken against them to address the situation. As a first step the Manager will contact the Human Resources

Department for advice before any investigation or disciplinary action is undertaken. All complaints in respect of equal opportunities and diversity will be treated seriously and the failure of a Manager to carry out their duties in respect to equal opportunities could also lead to disciplinary action being taken of itself.

Where the behaviour is not relate to the workplace the Manager will contact the Human Resources Department for advice on how to proceed with a potential investigation and resolution.

Policy

The laws prohibiting discrimination in the workplace apply to our employment decisions and we do not tolerate any type of unlawful discrimination on the grounds of 'The Protected Characteristics'.

Fair practices are applied from the outset of recruitment and this continues throughout employment, including learning and development, salary, benefits, transfers and promotions and is still relevant in respect of leaving and references.

We seek to monitor and review all our employment practices and procedures on a regular basis, whether such review is formal or informal. Our objective is to identify and eliminate any practices that may potentially unlawful discriminate.

We expect all our employees to comply with the principles surrounding non-discrimination set out in this policy and in law and we expect that all employees should treat each other and those they encounter at work with equal and due respect. Every individual is responsible not only for their own actions but to ensure that others do not breach the spirit and intent of this policy and the applicable anti-discrimination law too. Any discriminatory act should be reported, without delay, to your direct line manager/supervisor or the Human Resources Department within the business.

When recruiting a member of staff, we may request and record data relating to Protected Characteristics to assist compliance with this policy and the legal obligations we may have.

Types of discrimination

There are two broad forms of discrimination:

1. Direct
Direct discrimination occurs when less favourable treatment is applied based on the Protected Characteristics.
2. Indirect
Indirect discrimination occurs where a provision, criterion or practice which may appear neutral and to apply equally to all in fact puts a certain group of individuals with a relevant protected characteristic at a disadvantage in comparison to other workers.

It is also possible to discriminate against another because of a third party's Protected Characteristic (associative discrimination) and on the ground of perception (for example, the perceived sexual orientation of another). Discrimination may also take place because of victimisation or harassment and bullying, in this case you are referred to the Company's Bullying and Harassment Policy.

Disability and Reasonable Adjustments

Disabled employees' have special protection in the law, which includes an employer's duty to make reasonable adjustments to their employment or working conditions where appropriate (for an

applicant this includes considering reasonable adjustments in respect of attending a work interview).

If you consider you may be disabled within the meaning of disability provisions of the UK equality legislation or become disabled during your employment, you should notify your direct line manager/supervisor or the Human Resources Department. The Company will discuss with you whether you can fulfil your proposed duties and whether there are any adjustments that could reasonably be made to enable you to carry out your duties effectively. Careful consideration will be given to any proposals and medical evidence or a medical advisor, appointed by the Company may also be consulted to give guidance on these matters.

There may be circumstances where it is not reasonably practicable to accommodate a proposal and therefore declining a request to make adjustments may be justified in line with statutory provisions.

Applicants for a role will not be asked questions relating to their health prior to an offer of employment being made to them other than in the following circumstances:

- For equal opportunities monitoring
- For positive action
- To assess whether reasonable adjustments need to be made to the recruitment process
- To assess whether an applicant is able (with any reasonable adjustments) to carry out an intrinsic part of the job.

Associated Policies

- Whistleblowing Policy