

## **1.10 Equal Opportunities / Diversity Policy**

The Company is an equal opportunity employer. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination. We do not discriminate against staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics).

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. 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.

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, [volunteers,] [interns,] casual workers and agency staff.

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.

We aim to ensure that our staff achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria. We have adopted the following equal opportunity policy as a means of helping to achieve these aims.

- 1) Direct discrimination occurs where someone is put at a disadvantage on discriminatory grounds in relation to his or her employment. Direct discrimination may occur even when unintentional.

### **Examples:**

- A woman with young children fails to obtain a job because it is feared that she might be an unreliable member of staff.
- A Sikh applicant for a senior post is not appointed because he might not "fit in" with the existing (all white) team.
- A person is subjected to sexual innuendo or other offensive conduct of a sexual nature at work.

- 2) Indirect discrimination occurs where the individual's employment is subject to an unjustified condition which one sex or race/nationality finds more difficult to meet although on the face of it the condition or requirement is "neutral".

**Examples:**

- A requirement for GCSE English as a selection criterion. This would have a disparately adverse impact on people educated overseas and may not be justified if all that is needed is to demonstrate a reasonable level of literacy.
  - Full-time work – this would have a disparately adverse impact on women as they are generally accepted as taking the primary childcare role. It may not be justified if our business needs can still be met by more flexible working arrangements.
- 3) Disability discrimination occurs where an individual is unjustifiably disadvantaged in employment/recruitment for a reason connected with his/her disability unless the discrimination cannot be avoided by making reasonable adjustments.

**Examples:**

- Requirements for staff to hold a valid driving licence for a job, which involves little travelling.
  - Failure to recruit a wheelchair user without first considering whether the working arrangements or premises can reasonably be adapted to his/her/their needs.
- 1) Victimisation occurs where an individual is treated less favourably than colleagues are because he/she has taken action to assert their statutory rights or assisted a colleague with information in that regard.
  - 2) 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.

## **Implementing Equality of Opportunity**

Recruitment and employment decisions will be made on the basis of fair and objective criteria. Our selection procedures are reviewed from time to time to ensure that they are appropriate for achieving our objectives and for avoiding unlawful discrimination.

The requirements of job applicants and existing members of staff who have or have had a disability will be reviewed to ensure that wherever possible reasonable adjustments are made to enable them to enter into or remain in employment with us.

Promotion opportunities, benefits and facilities of employment will not be unreasonably limited and every reasonable effort will be made to ensure that disabled staff participate fully in the workplace.

Person specifications will be limited to those requirements, which are necessary for the effective performance of the job. Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary.

Appropriate training will be provided to enable staff to implement and uphold our commitment to equality of opportunity.

Working patterns will be reviewed so as to enable us to offer flexible working to staff where possible.

All staff have a right to equality of opportunity and a duty to implement this policy. Breach of this policy is potentially a serious disciplinary matter. Anyone who believes that he or she may have been disadvantaged on discriminatory grounds is entitled to raise the matter through the grievance procedure.

