

## Equal opportunities and diversity policy

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### Our commitment

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We are committed to providing equality of opportunity in our employment practices and procedures, and to avoiding unlawful discrimination being suffered by our employees, job applicants, clients or customers.

We will not discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

We will not discriminate unlawfully against customers, contractors, suppliers or visitors using or attempting to use the goods, facilities and services that we provide.

This aim of this policy is to assist us in putting this commitment into practice to ensure all our employees are treated fairly, respectfully and without prejudice, so that you are able to maximise your full potential, and do not commit or are not subjected to unacceptable and unlawful acts of discrimination.

Our policy is implemented in accordance with the Equality Act 2010 and all other appropriate statutory requirements and has been compiled after consideration of all available guidance and relevant Codes of Practice.

We will strive to ensure that our work environment remains positive, free from harassment and bullying, and that everyone is treated with dignity and respect at all times in maintaining and sustaining equal opportunities in employment.

We will avoid unlawful discrimination in all aspects of employment including recruitment, selection, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

### Responsibility for the policy

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Our Board of directors has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility for this policy has been delegated to the Head of Legal.

All managers must set an appropriate standard of behaviour, 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.

### Types of unlawful discrimination

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**Direct discrimination** is where a person is treated less favourably than another because of a protected characteristic. An example of direct sex discrimination would be refusing to employ a woman because she was pregnant.

**Indirect discrimination** is where a provision, criterion or practice is applied that is discriminatory, in relation to individuals that have a protected characteristic. However, for there to be a claim of indirect discrimination the provision, criterion or practice must also:

- be to the detriment of people who share the particular protected characteristic compared with people who do not; and
- not be a proportionate means of achieving a legitimate aim.

**Harassment** is where there is unwanted conduct related to one of the prohibited grounds which has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment will have taken place in such circumstances even if this effect was not intended by the person responsible for the conduct.

**Associative discrimination** is where an individual is directly discriminated against or harassed due to their association with another individual who has a protected characteristic.

**Perceptive discrimination** is where an individual is directly discriminated against or harassed due to a mistaken perception that he/she has a particular protected characteristic.

**Failure to make reasonable adjustments** is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have a

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disability and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

**Victimisation** occurs where an employee is subjected to a detriment, because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. However, an employee is not protected from victimisation if he or she gave false evidence or information, or made a false allegation, if the evidence or information is given, or the allegation is made, in bad faith.

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## Recruitment

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination.

Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their merits and abilities.

Our advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. We take steps to ensure that our vacancies are advertised to a diverse labour market. If relevant, we will take steps to ensure vacancies are advertised to particular groups that have been identified as disadvantaged or underrepresented within our business.

Our application forms will be as simple as possible and will not seek irrelevant information.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job.

Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a protected characteristic. Job applicants should not be asked about health or disability before a job offer is made.

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.

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 will be removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy.

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## Training, pay and benefits

Training needs will be identified through appraisals and one to one meetings. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

Our conditions of service together with any benefits are reviewed regularly to ensure that they are not discriminatory, that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them.

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## Our practices

We will consider any possible indirectly discriminatory effect of our standard working practices, when considering requests for variations to these standard working practices.

Applications for such requests will be refused only if following investigation, we believe there are good reasons, unrelated to any prohibited ground of discrimination, for doing so.

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## Termination of employment

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

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

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## Equal opportunities training

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We will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

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## Dignity at work

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We have a separate 'dignity at work policy' concerning issues of bullying and harassment on any ground and how complaints of this type will be dealt with once reported.

We will provide you, new employees and others engaged to work within our organisation with training and awareness in helping them understand their rights and responsibilities under the dignity at work policy and what they can do to help create a working environment free of bullying and harassment.

We will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

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## Responsibilities

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You are required to support us in meeting our commitment to provide equal opportunities in employment and to avoid unlawful discrimination.

If you commit serious acts of harassment you may be guilty of a criminal offence. As well as exposing us to liability for unlawful discrimination, you can be held personally liable for such acts.

Acts of discrimination, harassment, bullying or victimisation in breach of this policy and/or our dignity at work policy are disciplinary offences and will be dealt with under our disciplinary procedure. Such acts may in certain circumstances be tantamount to gross misconduct and could lead to your summary dismissal.

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## Redress

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If you consider that you may have been unlawfully discriminated against or been the victim of a breach of this policy, you may use our grievance procedure to make a complaint.

If your complaint involves bullying or harassment, you should refer to the dignity at work policy.

We will take all complaints seriously and will seek to resolve any grievance which we uphold.

You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

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## Monitoring and review

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We will monitor this policy periodically to judge its effectiveness and it will be updated in accordance with appropriate changes in the law.

Information provided by job applicants and you for monitoring will be used only for this purpose. The data will be dealt with in accordance with the General Data Protection Regulations, where it cannot be anonymized or where there is a risk that the information can be identified to a particular person.

This policy will be monitored periodically by the Head of Legal to judge its effectiveness and will be updated in accordance with changes in the law.

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