

Equal Opportunities and Diversity Policy

Policy Statement

Equal opportunity is about fairness to everyone, employees, candidates, clients, suppliers and contacts. The Company are committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination. The Company recognises and values the diverse nature of our society and wish to ensure that no elements are disadvantaged through our employment practice. The Company strives to achieve and maintain an on-going awareness through communication, training and development of policies and procedures which are fair, consistent, legally compliant and follow best practice.

The Equality Act 2010 ties up all existing equality legislation. The protected characteristics are now all in one Act:

- Age
- Disability
- Race
- Sex
- Pregnancy and maternity
- Gender reassignment
- Marriage or civil partnership
- Religion or belief
- Sexual orientation

Discrimination has wide parameters as many areas are covered and individuals are also protected against unlawful discrimination by association.

Purpose and General Principles

The Company is committed to Equal Opportunities for all and actively discourages discrimination on any basis. Managers should be fully aware of their legal and social responsibilities in this area in respect of their dealings with customers, suppliers, employees and job applicants.

The Company will ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are determined on the basis of capability, qualifications, experience, skills and productivity.

If employees feel that they have been treated unfairly and discriminated against in any way, they should pursue their complaint through the grievance procedure.

These principles apply in all HR policies and procedures (an across the company as a whole). All policies are monitored and reviewed by the Company annually, in order to ensure continued effectiveness, legal compliance and use of best practice.

Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. Discrimination may be direct or indirect.

Types of Discrimination

Direct Discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

Indirect Discrimination

This is the application of a policy, criterion or practice which the employer applies to all employees but which is such that :

- It is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents;
- The employer cannot justify the need for the application of the policy on a neutral basis; and
- The person to whom the employer is applying it suffer detriment from the application policy

Harassment

This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation

This occurs when a person is treated less favourably because they have brought or intend to bring proceedings or they have given or intend to give evidence.

Recruitment and Selection

Our recruitment and selection policies and procedures aim to ensure there will be fair and non-discriminatory treatment for everyone. Our selection criteria are based on the job descriptions and person specifications.

Open advertising of vacancies internally ensures that employees have an opportunity to apply for any vacancy for which they feel they are suitable, enabling them to progress within the Company.

Vacancies will be advertised externally using trade press, local job centres and local press. Our aim is

to encourage applicants regardless of age, race, gender, disability, religion, belief or sexual orientation.

Training and Development

Selection for training of any kind is open to all, and again wholly reflects the Company's Equal Opportunities Policy and is no-discriminatory.

The Company encourages all employees to undertake further study relevant to their appointment. Opportunities to attend training courses will be provided to all employees, on an equal basis depending on agreed identified needs.

Content of all training is constantly reviewed and updated to reflect our commitment to Equal Opportunity Policies and procedures.

Performance assessment

Employees receive an annual review each year, based on key tasks and responsibilities within their position, with interim reviews as agreed with the employee. It provides a formal structure for discussion regarding work and career development within the Company and identifies any training needs.

The review is based on the job itself, and how it is undertaken, it should be objective and remove the opportunity for discriminatory factors to influence the outcome.

Progression

We develop employees on the basis of a fair assessment of their abilities. Progression will be determined solely by personal merit and performance.

Pay

Basic salaries are reviewed annual on the basis of merit, market rate and any appropriate industry standards.

Monitoring and review

This policy will be monitored periodically by the Company to judge its effectiveness. The Company will review its Equal Opportunities Policy in light of experience, changing legislation and CIPD recognised good practice.

Policy Communication

This policy will be passed to all staff and will form part of the induction pack for new arrivals. It will also be filed on the HR Portal and accessible to all staff. The policy will form part of our Sub-Contractor Information Pack.

Bullying and Harassment Policy

The Company wishes to provide a stimulating and supportive working environment which will enable its staff to fulfil their personal potential and creativity. Such an environment cannot exist where any member of staff is subjected to harassment, intimidation, aggression or coercion.

The Company is fully committed to the principles of equality and diversity in the workplace and regards harassment as a form of discrimination. As such the Company will not tolerate any form of bullying or harassment.

Harassment

Harassment is unwanted conduct which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may be on the grounds of sex, marital status, race, disability, religion or beliefs, sexual orientation, age or gender reassignment. For the purposes of this Policy this list should be considered non-exhaustive, and harassment or bullying on any grounds will not be tolerated by the Company.

- Harassment may be persistent or an isolated incident, obvious or subtle, face-to-face or indirect. It may even be through unequal or unfair application of monitoring systems, for example through the monitoring of breaks where it is not applied equally to all employees.
- Examples of behaviour which may constitute harassment or bullying include (but are not limited to):
 - spreading malicious rumours;
 - professional or social exclusion;
 - insulting behaviour;
 - unwelcome sexual advances or physical contact;
 - unfounded threats relating to job security;
 - calculated undermining of an employees competence, for example through a consistently unreasonable or unfair workload, overbearing supervision or unnecessary circulation of critical memoranda;
 - physical assault;
 - verbal abuse, threats, derogatory name-calling, ridicule, insults and offensive or embarrassing jokes;
 - offensive emails, texts or visual images;
 - derogatory graffiti/insignia or display of derogatory or offensive material; and
 - inciting others to commit any of the above.

Unlawful Grounds of Harassment and Bullying

The Company wishes to reiterate that it will not tolerate any instance of harassment or bullying regardless of the grounds. This Policy will equally apply to work related events even if they occur away from the normal workplace. The following are expressly unlawful grounds by which a person may experience harassment or bullying:

- Sex
- Marital Status
- Gender Reassignment
- Sexual Harassment
- Race
- Disability
- Sexual Orientation
- Religion or Belief
- Age
- Grievance

Procedure for Complaints

Any employee who feels that they have been subjected to harassment or bullying by any other member of staff, or a third party should raise the matter as soon as reasonably practicable.

- Employees can raise a complaint informally and/or formally. They should contact their line manager or another manager in the absence of that manager or where their complaint is against that specific manager.

Informal Procedure

- If the employee feels able, they should speak up at the time when they feel harassed or bullied. It is important to be direct and for the employee to state explicitly that they feel they are being harassed and that the behaviour is unacceptable to them. The employee can also discuss the matter with another colleague or their line manager and ask them to speak to the harasser on their behalf.
- Alternatively, if the employee feels unable to speak to the harasser directly, they could write a letter to them which clearly identifies the offending behaviour and requests that it stops immediately. The employee should sign and date any such letter and ensure that a copy is kept for any possible future formal complaint. It is also advisable that the employee keep an 'incident diary' of any offending behaviour.

Where the informal procedure has not resolved an employee's complaint, a formal grievance can be raised by the employee.

Formal Procedure

Any employee who feels that they have been subjected to harassment or bullying may at any time decide to deal with the issue through formal procedures, regardless of whether informal steps have been taken or not.

- Where an employee wishes to deal with any issue of harassment formally, they must do so according to the Company's Grievance Procedure
- Where employees are not happy with the outcome of the formal grievance procedure they can appeal this decision internally.
- The Company will investigate any informal or formal complaint thoroughly and fairly.

Consequences of Breach

Harassment is a disciplinary offence and will be dealt with according to the Company's Disciplinary Procedure. Bullying, harassment, victimisation or discrimination may constitute gross misconduct, punishable by summary dismissal without notice.

Third Party Harassment

Third party harassment refers to harassment of an employee by any person who is not an employee of the Company. Third party harassers may include:

- customers or clients of the Company;
- suppliers of the Company; and
- independent contractors.

Any employee who believes that they have been the victim of third party harassment should immediately inform their Manager of the incident.

Where an employee has been harassed on more than one occasion, the Company will take such steps as are reasonably practicable to prevent any recurrence.

For the purposes of third party harassment, it is immaterial whether the third party harasser is a different person in each instance of harassment.

Responsibilities of Employees and Managers

- All employees are responsible for their own behaviour and should ensure that they comply with this Policy at all times.
- All managers are responsible for implementing this Policy and bringing it to the attention of employees.

- Any complaints under this Policy brought to the attention of a manager must be dealt with promptly, confidentially, fairly and consistently.

Confidentiality

- The Company will treat any complaint received under this Policy confidentially.
- All employees involved with an investigation are required to respect the need for confidentiality.
- Any breaches in confidentiality will be subject to disciplinary action.