

## POLICY STATEMENT

It is the Company's policy not to discriminate against its workers on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy or trade union membership or the fact that they are a part-time worker or a fixed-term employee. Our workers and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes.

The Company shall, at all times, strive to work within legislative requirements as well as promoting best practice. Our long-term aim is that the composition of our workforce should reflect that of the local community and that all workers should be offered equal opportunities to achieve their full potential. We are committed to a programme of action to make this policy effective and to bring it to the attention of all workers. The principle of non-discrimination and equality of opportunity applies equally to the treatment of visitors, clients, customers and suppliers by members of our workforce and also, in some circumstances, ex-employees.

The following paragraphs deal with the specific categories of workers and areas of work which we have identified as potentially giving rise to equal opportunities issues and provides more specific guidance on the parameters of our policy and approach to equal opportunities.

This policy is for guidance only and shall be provided to all workers, but does not form part of your contract of employment.

### 1. TO WHOM DOES THIS POLICY APPLY?

- 1.1 This policy applies to the Company's employees, whether permanent, temporary, casual, part-time or on fixed-term contracts, to ex-employees, to job applicants and to individuals such as agency staff and consultants who are not our employees, but who work at the Company (collectively **workers**).
- 1.2 All workers have a duty to act in accordance with this policy, and therefore to treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, whether junior or senior to them. In some situations, the Company may be at risk of being held responsible for the acts of individual members of staff and will not therefore tolerate any discriminatory practices or behaviour.
- 1.3 The policy statement in paragraph 1.2 applies equally to the treatment of our visitors, clients customers and suppliers by our workers.

### 2. PERSONNEL RESPONSIBLE FOR IMPLEMENTATION OF POLICY

- 2.1 The board has overall responsibility for the effective operation of the Company's equal opportunities policy (**EOP**) and for ensuring compliance with the relevant statutory framework prohibiting discrimination. The board has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to the CEO.
- 2.2 Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of the Company with regard to equal opportunities. To facilitate this process, managers will be given

training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

- 2.3 All members of staff are responsible for the success of this policy and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives. If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact your mentor to request training or an information pack.

### 3. SCOPE AND PURPOSE OF POLICY

- 3.1 The Company will not unlawfully discriminate on grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy, trade union membership, or part-time or fixed-term status.

- 3.2 This policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay; to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment, including redundancy.

- 3.3 The Company will take appropriate steps to accommodate the requirements of workers' religions, cultures, and domestic responsibilities.

### 4. FORMS OF DISCRIMINATION

Discrimination may be direct or indirect and it may occur intentionally or unintentionally. Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the grounds set out in paragraph 3.1. For example, rejecting an applicant of one race because it is considered they would not "fit in" on the grounds of their race could be direct discrimination. Indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race. For example, a height requirement would be likely to eliminate proportionately more women than men. If this criteria cannot be objectively justified for a reason unconnected with sex, it would be indirectly discriminatory on the grounds of sex. Discrimination also includes victimisation (less favourable treatment because of action taken to assert legal rights against discrimination or to assist a colleague in that regard) and harassment (see the Company's Anti-Harassment and Bullying Policy).

### 5. RECRUITMENT AND SELECTION

- 5.1 The Company aims to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed in paragraph 3.1. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are regularly reviewed to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

- 5.2 The Company shall take steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups under-represented in the Company.

Where appropriate, use may be made of lawful exemptions to recruit suitably-qualified people to cater for the special needs of particular groups. Vacancy advertisements shall include an appropriate short statement on our equal opportunities policy and a copy of this policy shall be sent to those who enquire about vacancies.

5.3 To ensure that this policy is operating effectively with respect to recruitment and selection and the other areas identified in paragraph 3.2, and to identify those sections of the local community which may be under-represented in employment, the Company monitors applicants' racial origins, gender, disability, sexual orientation and religion and age as part of the recruitment procedure. We also maintain records of this data solely for the purposes stated in this policy. Ongoing monitoring and regular analysis of the data provide the basis for taking appropriate steps to eliminate unlawful direct and indirect discrimination and implement this policy.

## 6. STAFF TRAINING AND PROMOTION AND CONDITIONS OF SERVICE

6.1 Staff training needs will be identified through regular staff appraisals. All workers will be given appropriate access to training to enable them to progress within the organisation. All promotion decisions will be made on the basis of merit.

6.2 The composition and movement of workers at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.

6.3 Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them.

## 7. TERMINATION OF EMPLOYMENT

7.1 We will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against employees.

7.2 We will also ensure that disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

## 8. DISABILITY DISCRIMINATION

8.1 If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible. You may also wish to advise your Mentor or Project Manager of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. Your Mentor or Project Manager may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job. Nevertheless, there may be circumstances where it will not be reasonable for us to

accommodate the suggested adjustments and we will ensure that we provide you with information as to the basis of our decision not to make any adjustments.

- 8.2 The Company will monitor the physical features of its premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other workers. Where possible and proportionate, the Company will take steps to improve access for disabled workers and service users.

## 9. **FIXED-TERM EMPLOYEES AND AGENCY AND TEMPORARY WORKERS**

We will monitor our use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress within the Company to ensure that they are accessing permanent vacancies.

## 10. **PART-TIME WORKERS**

The Company will monitor the conditions of service of part-time employees and their progression within the Company to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will also ensure requests to alter working hours are dealt with appropriately under our flexible working policy.

## 11. **BREACHES OF THE POLICY**

- 11.1 If you believe that you may have been disadvantaged on any of the unlawful grounds listed at paragraph 3.1, you are encouraged to raise the matter through the Company's grievance procedure. If you believe that you may have been harassed on any of the unlawful grounds listed at paragraph 3.1, you are encouraged to raise the matter through our Anti-Harassment and Bullying Policy. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Workers who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach in this policy which are found to have been made in bad faith will, however, be dealt with under our disciplinary procedure.
- 11.2 If, after investigation, you are proven to have harassed any other worker on the grounds of sex, marital status, sexual orientation, religion or belief, race, disability or age or otherwise act in breach of this policy, you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. the Company will always take a strict approach to serious breaches of this policy.
- 11.3 As this policy applies equally to the Company workers' relations with visitors, clients, customers and suppliers, if, after investigation, you are proven to have discriminated against or harassed a client or supplier you will also be subject to disciplinary action.

## 12. **MONITORING AND REVISION OF POLICY**

- 12.1 This policy is reviewed annually by the Company.
- 12.2 Policy last updated 28 May 2008.

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- 12.3 We will regularly monitor the effectiveness of this policy to ensure it is achieving the objectives stated in the EOP statement by monitoring the composition of job applicants and the benefits and career progression of its workers.
- 12.4 The Company is committed to providing relevant training for all staff on their responsibilities and duties under this policy.