

## **EQUAL OPPORTUNITIES 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 on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. These are known as "protected characteristics".

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

### **1 What is discrimination?**

- 1 *Direct* discrimination occurs where someone is treated less favourably than another person because they have a protected characteristic; they are thought to have a protected characteristic; or they associate with someone who has a protected characteristic. Direct discrimination may occur even when unintentional.
- 2 *Indirect* discrimination occurs where a provision, criterion or practice that applies to everyone particularly disadvantages people who share a protected characteristic. For example, a requirement for GCSE English as a selection criterion. This would have an adverse impact on people educated overseas and may not be justified if all that is needed is to demonstrate a reasonable level of literacy.
- 3 *Harassment* is defined as unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for an individual. Harassment is covered in more detail in the Company's Harassment policy.
- 4 *Victimisation* occurs where an individual has been treated less favourably than another person because he or she has made allegations. It does not matter if the allegations are not true, providing they were made in good faith. It can also occur when an individual is treated less favourably if they have given evidence or information.

### **2 Commitment**

- 1 We are committed to ensuring that all of our employees and applicants for employment are protected from unlawful discrimination in employment.
- 2 Recruitment and employment decisions will be made on the basis of fair and objective criteria.
- 3 Person and job specifications shall be limited to those requirements which are necessary for the effective performance of the job.
- 4 Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary and relevant.
- 5 All employees have a right to equality of opportunity and a duty to implement this policy. Discrimination is a serious disciplinary matter which will normally be treated as gross misconduct.
- 6 Anyone who believes that he or she may have been disadvantaged on discriminatory grounds should raise the matter through the Company's grievance procedure.
- 7 We will make sure that the services we provide, or the goods we purchase from other organisations do not discriminate against any section of the community.
- 8 Our priority will be to provide services that are responsive to people's diverse needs, accessible and culturally appropriate within the resources we have.

## **Unlawful Reasons for Discrimination**

### **Age**

It is not permissible to treat a person less favourably because of their age. This applies to people of all ages.

### **Disability**

It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to the service and ability to be employed, trained, or promoted as a non-disabled person.

The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- Making adjustments to premises;
- Re-allocating some or all of a disabled employee's duties;
- Transferring a disabled employee to a role better suited to their disability;
- Relocating a disabled employee to a more suitable office;
- Giving a disabled employee time off work for medical treatment or rehabilitation;
- Providing training or mentoring for a disabled employee;
- Supplying or modifying equipment, instruction and training manuals for disabled employees; or
- Any other adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company.

If an employee has a disability and feels that any such adjustments could be made by the Company, they should contact their supervisor or manager.

### **Gender Reassignment**

It is not permissible to treat a person less favourably because they are proposing to undergo, they are undergoing or have undergone a process (or part of a process) for the purpose of reassigning their sex.

### **Marriage & Civil Partnership**

It is not permissible to treat a person less favourably due to the fact they are married or a civil partner.

### **Pregnancy & Maternity**

It is not permissible to treat a person less favourably due to pregnancy or maternity.

### **Race, Colour, Nationality and Ethnic Origin**

It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.

### **Religion or Belief**

It is not permissible to treat a person less favourably because of their religion, religious or philosophical beliefs, or lack of the same.

### **Sex**

It is not permissible to treat a person less favourably due to their gender.

### **Sexual Orientation**

It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because s/he is homosexual, or transsexual.

### **Responsibility for the Implementation of this Policy**

- 1.1 The co-operation of all employees is essential for the success of this Policy. However, the ultimate responsibility for achieving the objectives of this Policy and for ensuring compliance with relevant Legislation and Codes of Practice lies with the Company. Managers and supervisors are expected to follow this Policy and ensure that all employees, subcontractors and agents do the same.
- 1.2 All employees, subcontractors and agents of the Company are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.
- 1.3 Employees may be held independently and individually liable for their discriminatory acts by an Employment Tribunal and ordered to pay compensation to the person who has suffered as a result of discriminatory acts.

### **Acting on Discriminatory Behaviour**

- 1.4 In the event that an employee is the subject or perpetrator of, or witness to, discriminatory behaviour, please refer to the Company's disciplinary and grievance procedures.

### **Advice and Support on Discrimination**

- 1.5 Advice and support on discrimination is provided by a number of bodies, including the following:

#### **Equality and Human Rights Commission**

Arndale House  
Arndale Centre  
Manchester  
M4 3AQ  
Telephone: 0845 604 6610  
Website: [www.equalityhumanrights.com](http://www.equalityhumanrights.com)

#### **Citizens Advice Bureau**

Myddleton House  
115-123 Pentonville Road  
London  
N1 9LZ  
Website: [www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)

#### **Community Legal Advice**

Telephone: 0845 345 4 345  
Website: [www.communitylegaladvice.org.uk](http://www.communitylegaladvice.org.uk)