

EQUAL OPPORTUNITIES, DIVERSITY AND NON-DISCRIMINATION POLICY

Purpose

The company is committed to providing equal opportunities, encouraging diversity and not to discriminate on the grounds of age, sex, religion or belief, marital status or civil directorship, race, colour, nationality, ethnic or national origins, disability, sexual orientation or gender reassignment in all areas of its work and in relation to all of its responsibilities.

The company is opposed to all forms of discrimination including direct discrimination, indirect discrimination, harassment, victimisation and all instances of less favourable treatment. In addition, all employees and directors will take such steps as are necessary to make reasonable adjustments for the needs of those clients and other employees and directors who have a disability.

Scope

This Policy ensures that all employees, prospective employees and clients will receive equal treatment and consideration. It deals with all professional dealings by personnel and covers:

- Employment;
- Recruitment and selection;
- Training, promotion and conditions of service;
- The provision of services to clients;
- Interaction with everyone involved in or incidental to the provision of services by the company.

Definitions

The following are the kinds of discrimination that are against the company's policy:

- **Direct discrimination** where a person is less favourably treated because of their religion or belief, marital status or civil directorship, race, colour, nationality, ethnic or national origins, disability, sexual orientation or gender reassignment. An example is if someone is refused promotion on the grounds that he or she is a certain age, or black, or disabled, or if she is a woman, or a combination of these examples;
- **Indirect discrimination** where a requirement or condition, which cannot be justified, is applied equally to all groups but has a disproportionately adverse effect on one particular group. An example is where an age limit for new recruits may exclude many women of that age group because they are unable to apply for the job as a result of family commitments, or the restricting of recruitment to areas where there are few ethnic minorities, or a requirement which is non-essential to the job description which may exclude a disabled person (such as the requirement for a driving licence for job which is mainly office based);
- **Victimisation** where someone is treated less favourably than others because he or she has taken action against the company under the Equality Act 2010;
- **Displaying inappropriate images** including nude or semi-nude calendars, posters and PC screen savers can be offensive and will not be tolerated;
- **Harassment** consists of any unwanted conduct affecting the dignity of women and men at work. It includes unwelcome physical, verbal or non-verbal conduct and it could amount to unlawful discrimination. It can involve a single incident or may be persistent and may be directed towards one or more individuals. In addition to racial and sexual harassment, for the purposes of this policy, harassment on the basis of age,

disability, health, social class, religion, sexual orientation, nationality or employment status are also included;

- **Unwanted physical contact** such as unnecessary touching, patting, pinching, brushing against another individual's body, insulting behaviour or gestures, physical threats and assault;
- **Unwanted verbal conduct** such as unwelcome advances, names, innuendo, lewd comments, abusive language, references to a person's gender, colour, race etc;
- **Unwanted non-verbal conduct** such as racially or sexually based graffiti referring to an individual's characteristics or private life, abusive or offensive gestures, display of pornographic or suggestive literature or other items and inappropriate use of visual display units;
- **Bullying** including persistent criticism and personal abuse and/or ridicule, either in public or private, which humiliates or demeans the individuals involved, gradually eroding their self-confidence;
- **Other conduct**, which denigrates, ridicules, intimidates or is physically abusive of an individual or group.

These examples are not exhaustive. Much of this behaviour is considered to be gross misconduct, and will result in summary dismissal. None of the above types of behaviour will be tolerated. All will result in a disciplinary investigation and may constitute gross misconduct depending upon the circumstances of the case in question.

Approach

Employment issues

The Company will treat all employees and job applicants equally and fairly and will not unjustifiably discriminate against them in relation to any of the Company's arrangements for recruitment, promotion, training, terms and conditions, grievances, disciplinary processes, termination of employment, the allocation of work or any other employment related matters.

The Company acknowledges the benefits of a diverse workforce and will take appropriate steps to ensure that its recruitment processes reflect this at all stages.

The Company will use its best endeavours to comply with any prevailing guidance, policies and targets for the employment of ethnic minorities.

The Company will treat all employees equally and will create a working environment that respects diverse backgrounds and beliefs and is free from discrimination and harassment.

The Company will ensure that promotion is made on the basis of merit and that discriminatory influences are not allowed to affect those decisions, that selection criteria are kept under review and that positive action measures are taken where it is appropriate and legal to do so.

Clients

The Company is generally free to decide whether to accept business from any particular client, but any refusal will not be based upon any of the forbidden grounds.

The Company will take steps to meet the different needs of particular clients arising from its obligations under the Equality Act 2010.

In addition, where necessary and where it is permitted by the Equality Act 2010 (for example, provisions relating to positive action or exemptions), the company will seek to provide services which meet the specific needs and requests arising from clients' ethnic or cultural background; gender; age; responsibilities as carers; disability; religion or belief; sexual orientation or other relevant factors.

Suppliers

All lists of approved suppliers and databases of contractors, agents and other third parties regarded as suitable to be instructed by those within the Company have been compiled only on the basis of the ability of those persons or organisations to undertake work of a particular type and contain no discriminatory exclusion, restriction or preference.

Positive Action

The company recognises that to be effective an equality and diversity policy needs to be promoted to those whom it will benefit and affect. The company is committed to taking such positive steps as are necessary to draw to the attention of all staff, clients and third parties the existence of this policy and to ensure that training is provided as appropriate to ensure compliance with its provisions.

Although it is unlawful and against the company's policy positively to discriminate in favour of certain groups on the grounds of their race or sex, positive action to enable greater representations of under-represented groups is permitted by the law and encouraged by the company.

f. Complaints and disciplinary issues

The company will treat seriously, and will take action where appropriate concerning, all complaints of discrimination or harassment on any of the forbidden grounds made by employees, clients, or other third parties. All complaints will be investigated in accordance with the company's grievance or complaints procedure and the complainant will be informed of the outcome. Any person who is found to have unlawfully discriminated or harassed or bullied anyone in contravention of the terms of this Policy will become subject to the appropriate disciplinary measures.

g. Training

The company arranges training sessions for all personnel on this topic and refresher training is completed on a regular basis. Directors are trained in the principles of equality and diversity and will challenge discriminatory behaviour at every opportunity.

Responsibilities

The Managing Director is responsible for this Policy and for ensuring that it is implemented across the company and that all employees adhere to its provisions.

All employees are required to adhere to the terms and conditions of this policy and should understand that this policy is also incorporated into their contract of employment.

Directors are responsible for ensuring that this policy is applied within their own department/office. Any queries on the application or interpretation of this policy should be discussed with the HR Consultant prior to any action being taken.

Monitoring and Review

This policy will be monitored by the company to judge its effectiveness and will be reviewed and updated if necessary on an annual basis. The Managing Director will ensure that all of the policies, practices and procedures of the Company are amended in order to take account of the provisions if this policy and will monitor:

- The gender, age, religion, sexual orientation and ethnic composition of the workforce as well as the number of disabled employees at different levels of the organisation;
- The operation of this policy will be on an on-going basis, and will evaluate the effectiveness of this policy in achieving its objectives and recommend such changes as are required to ensure its future effectiveness.

Any act of discrimination, bullying, harassment, unfair treatment or breach of the provisions of this policy will result in disciplinary or other appropriate action being taken against the person concerned and the company will treat seriously any allegation that such an act has taken place.