

Equality Policy

We are committed to eliminating discrimination amongst our workforce. Our objective is to create a working environment in which there is no unlawful discrimination and all decisions are based on merit.

Also refer to the Company Social Responsibility Statement.

1. Eligibility

1.1 This policy applies to all employees, contractors and job applicants.

2. What is discrimination?

2.1 Discrimination is unlawful when it takes place on one of the following grounds (the 'protected characteristics'):

- age
- disability
- gender re-assignment
- marriage and civil partnership
- pregnancy and maternity
- race
- ethnic or national origin
- religion or belief
- sex
- sexual orientation

2.2 Discrimination can take a number of forms:

- Direct discrimination is when someone is treated worse than someone else because of a protected characteristic. For example, it would be direct discrimination if a manager excludes an employee from a training course because she is gay.
- It is also direct discrimination when someone is treated worse than someone else because they associate with someone with a protected characteristic or because they are perceived to have a protected characteristic. For example, it would be direct discrimination if an employee ostracised a colleague because the colleague has a gay flatmate or because he thinks the colleague is gay.

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- Indirect discrimination is when an apparently neutral practice or requirement disproportionately disadvantages one group and cannot be justified by the needs of the business. For example, imposing a requirement that job applicants must speak fluent English disproportionately disadvantages non-English groups and would be unlawful unless it could be justified on genuine business grounds.
- It is also discrimination when a disabled person is treated unfavourably because of something connected to their disability and this cannot be justified by the needs of the business or when the business fails to make reasonable adjustments for a disabled person.

3. Our approach to our employees and contractors

- 3.1 All employees and contractors have a duty not to discriminate against each other and not to help anyone else do so. We will not tolerate discrimination in our workforce.

4. Recruitment and selection

- 4.1 We aim to ensure that job requirements and job selection criteria are clear and based only what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.
- 4.2 We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups and which are not justified by the demands of the job.
- 4.3 For all jobs, we will draw up a clear and accurate job description and person specification to ensure that we remain focussed on what the job involves and the skills, experience and qualifications which are relevant and necessary to do the job.
- 4.4 If we hold interviews, we will try to ensure that more than one person conducts them to ensure that we avoid unintentional bias.

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5. Promotion training and appraisals

- 5.1 Promotion and training decisions will be made on the basis of merit. We will not unlawfully discriminate against any employee in making promotion or training decisions. We believe all employees should have an equal opportunity to progress and develop.
- 5.2 We will try to ensure that promotion opportunities are brought to the attention of all employees.
- 5.3 Training needs will be identified through regular reviews/training needs analysis/appraisal discussions.
- 5.4 We have a formal appraisal system which helps us to ensure that employees are being assessed fairly on the basis of job performance and are not being discriminated against. We will conduct appraisals objectively and measure performance in a transparent and objective way, without prejudice or bias.]

6. Working conditions and terms of employment

- 6.1 We will try to accommodate cultural or religious practices such as prayer requirements where we reasonably can.
- 6.2 We aim to ensure that our terms of employment, benefits, facilities and policies are free from unlawful discrimination.
- 6.3 We will ensure that decisions made under our disciplinary, grievance and attendance management policies are carried out fairly and without discrimination.

7. Disabled employees

- 7.1 We will make adjustments to accommodate disabled employees where possible and reasonable. If you think you may have a disability, you are encouraged to tell the business about this so that we can explore what adjustments might be appropriate.

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8. Termination of employment

- 8.1 We will ensure that we avoid discrimination in making decisions about dismissal or redundancy.

9. Your rights and responsibilities

- 9.1 You have the right not to experience unlawful discrimination in our workplace. You also have a responsibility to understand this policy and help us to implement it.
- 9.2 All employees, workers, agency workers and contractors have a duty not to discriminate against each other and not to help anyone else do so.

10. Our relationships with visitors/customers/suppliers

- 10.1 You must not discriminate against any of our visitors/customers/suppliers. Equally, we expect our visitors/customers/suppliers not to discriminate against you and we will take appropriate action against any visitor/customer/supplier found to have done so.

11. What to do if you have been discriminated against

- 11.1 If you believe you may have been discriminated against, please tell us. You can speak informally with your manager or with HR. If you want to make a more formal complaint, you are encouraged to raise the matter through our Grievance Procedure. If you believe there has been any bullying or harassment then you should raise the matter through our Bullying and Harassment Policy HRPOL003.
- 11.2 Allegations of potential breaches of this policy will be treated seriously. Employees and contractors who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under our disciplinary procedure.

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12. What will happen if you act in a discriminatory way?

12.1 If, after investigation, we decide that you have acted in breach of this policy you may be subject to disciplinary action up to and including summary dismissal. This applies to the most senior levels of management as well as to all other employees.

13. Data protection

13.1 For information about our processing of personal data under this policy, including details of our legal grounds for doing so, how long we retain such personal data, who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns, please see our employee privacy notice.

14. Status of this policy

14.1 This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.