

Reviewed; March 2025

Equal opportunities and dignity at work

Introduction

The Company is an equal opportunity employer and is fully committed to a policy of treating all employees and job applicants equally. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, and selection for redundancy and dismissal.

Protected characteristics The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to:

- age,
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,
- race (including colour, nationality and ethnic or national origins),
- religion or belief,
- sex
- sexual orientation. In this policy, these are known as the “protected characteristics”.

Anti-harassment protected characteristics

The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment and bullying based upon:

- age,
- disability,
- gender reassignment,
- race (including colour, nationality and ethnic or national origins),
- religion or belief,
- sex or sexual orientation.

In this policy, these are known as the “anti-harassment protected characteristics”. All employees are responsible for conducting themselves in accordance with this policy. The Company will not condone



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or tolerate any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers.

Employees have a duty to co-operate with the Company to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation.

Serious breaches of this equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination or harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

You should draw the attention of your Manager to suspected discriminatory acts or practices or suspected cases of harassment or bullying. You must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure. You should support colleagues who suffer such treatment and are making a complaint.

The Company will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its employees.

Direct discrimination

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

By association

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic.

By perception

In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not. The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment.



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Indirect discrimination

Indirect discrimination is treatment, usually the application of a provision, criterion or practice (PCP), which may be equal in the sense that it applies to all job applicants or employees but which is discriminatory in its effect on particular job applicants or employees in relation to a protected characteristic.

A PCP is discriminatory in relation to a protected characteristic of a job applicant or employee if:

- it is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic
- it puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it
- it puts, or would put, the job applicant or employee at that disadvantage, and
- it cannot be shown by the Company to be a proportionate means of achieving a legitimate aim.

The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

Victimisation

Discrimination by victimisation occurs when a person is treated less favourably than another because he/she had asserted his/her rights under the Equality Act, relating to discrimination, or had helped another person to assert those rights. An employee is not protected if they have maliciously or supported or encouraged an untrue complaint against another staff member.

Recruitment, advertising and selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.



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Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Company will apply that requirement to the job role and this may therefore be specified in the advertisement.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. All questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

Reasonable adjustments

With disabled employees and job applicants, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled. If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

Training and promotion

The Company will train all supervisors in the Company's policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices or acts of harassment or bullying. Supervisors will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.

The Company will also provide training to all employees to help them understand their rights and responsibilities in relation to equal opportunities and dignity at work and what they can do to create a work environment that is free from discrimination, bullying and harassment.

Terms of employment, benefits, facilities and services

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.



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Equal pay

The Company is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, the Company will endeavour to maintain a pay system that is free from bias and based on objective criteria.

Bullying and harassment

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, for example, during business trips and at work-related social events. Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.

The Company considers that an employee harasses another employee if they engage in unwanted conduct, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

An employee also harasses another employee if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

Finally, an employee harasses another employee if they or a third party engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee, and because of that other employee's rejection of or submission to the conduct, they treat that other employee less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

By association

The unwanted conduct will still amount to harassment if it is based on the anti-harassment protected characteristic of a third party with whom the employee is associated and not on the employee's own anti-harassment protected characteristic, or if it was directed at someone other than the employee, or even at nobody in particular, but they witnessed it.



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By perception

In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that an employee has a particular anti-harassment protected characteristic, when in fact they do not.

Intent

Conduct may be harassment whether or not the person intended to offend. Something intended as a “joke” or as “office banter” may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature
- subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures
- the offer of rewards for going along with sexual advances or threats for rejecting sexual advances
- jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory
- demeaning comments about an employee's appearance
- questions about an employee's sex life
- the use of nicknames related to an anti-harassment protected characteristic whether made orally or by e-mail
- picking on or ridiculing an employee
- isolating an employee or excluding him or her from social activities or relevant work-related matters



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Reporting complaints

All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from employees.

If you wish to make a complaint of discrimination, you should use the Company's grievance procedure.

With cases of harassment, while the Company encourages employees who believe they are being harassed or bullied to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical. In the event that such informal direct communication is either ineffective or impractical, or the situation is too serious to be dealt with informally, you should use the Company's grievance procedure.

If your complaint is upheld and the harasser remains in the Company's employment, the Company will take all reasonable steps to ensure that you do not have to continue working alongside him or her if you do not wish to do so. The Company will discuss the options with you.

If your complaint is not upheld, all efforts will be made for you and the alleged harasser to continue or resume working and to repair working relationships. You will not be penalised for raising a complaint, even if it is not upheld, unless your complaint was both untrue and made in bad faith.

Disciplinary sanction

Any employee who is found to have knowingly discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line supervisors who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

Monitoring equal opportunity and dignity at work

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, the Company will implement them. The Company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.



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Gender Re-assignment

The Company recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

The Company will support any employee or worker through the reassignment.

The Company will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

Where an employee is engaged in work where the gender change imposes genuine problems The Company will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should have recourse to the Company's grievance procedure.

Part-time Workers

The Company recognises that part time employees must be treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. The Company also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.