

P-06 – Equality and Diversity Policy

Introduction

We are committed to the policy of equal treatment of all employees and applicants. Our aim is to recruit, train, promote and reward on the basis of merit and irrespective of the protected characteristics detailed in the Equality Act 2010 (gender, disability, sexual orientation, marriage or civil partnership, pregnancy & maternity, gender reassignment, age, religion or belief, race, which includes colour, nationality, ethnic or national origins) or in relation to part time status, trade union membership and political belief or affiliations.

We are therefore committed to providing equality of opportunity for you by:

- Preventing any form of direct or indirect discrimination or victimisation or bullying.
- Promoting a good and harmonious working environment where all individuals are treated with respect and dignity and in which no form of intimidation or harassment from colleagues, customers or clients will be tolerated.
- Fulfilling all legal obligations under relevant legislation and associated Codes of Practice where they apply.

You must be aware of the importance we attach to our Equal Opportunities Policy, and must ensure that you do not, by your own actions, behaviour or attitude, directly or indirectly or unintentionally discriminate against any job applicants, employees, customers or clients. Any act of discrimination will be treated as a disciplinary offence; these will include for example, discrimination in selecting, promoting or training, refusing to work with or for a person because of any of the reasons stated in paragraph one of this policy and harassment of any employee, customer or client.

Direct Discrimination

Unlawful direct discrimination occurs when a person is treated less favourably than another because of one or more of the protected characteristics set out above. Direct discrimination, for example, can occur where a person is refused a job, training or promotion in any of these circumstances.

Indirect Discrimination

Unlawful indirect discrimination is when a provision, criterion or practice is applied to all people but which, in practice, is such that fewer people in certain groups are able to comply and it cannot be shown to be a proportionate means of achieving a legitimate aim. Some practices may look fair but have an unintended discriminatory effect. For example, if the Company made a GCSE English qualification a requirement as selection criteria. This would have a disproportionate adverse impact on people educated overseas and may not be justified if all that is required for the job is to demonstrate a level of literacy or the ability to communicate with others. The necessary level of literacy can be tested or checked in other ways that are more relevant to the job.

Time off for Religious Observance

We will consider any request made for time off to observe particular religious commitments with sensitivity and sympathetically. Where possible, such requests will be agreed and time may be taken as unpaid time off or made up at a different time which suits the company.

If the work simply cannot be done at another time, then we will be unable to agree to the request as it would mean that the business operation would suffer.

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Consideration will also be given to the locations and the timings of meetings and functions. We will treat your beliefs and religion with sensitivity. For example, locations for business meetings will be checked regarding alcohol if you are required to attend the meeting follows a doctrine which prevents you from attending meetings at such a place. The timing of routine meetings will, as far as possible, not be arranged when, due to following a particular religion, you would not be able to attend due to that religion.

Some religions require their followers to pray at specific times during the day. We will allow time off for quiet prayer which can be taken at times convenient to the business and in a convenient place. This time will be unpaid unless it can be made up at a time which is convenient to the Company.

If you request time off for religious practices, such requests will be treated with sensitivity, and your duties and the impact on the business considered carefully.

If you wish to make a request under this section of the policy you should talk to your line manager who will discuss your requirements to see if these can be accommodated.

Using Holidays

Sensitive consideration will be given to requests to take holiday (or unpaid leave or flexitime) to observe religious holidays. Wherever possible, we will agree to these requests. However, if we have a legitimate business reason for refusing your request then this will be the outcome as we are permitted to make these decisions based on the need to operate the business effectively. If requests are made with as much notice as possible being given it may be more likely that these can be accommodated and planned for in the business work schedule.

Religious and Cultural Dress

You may wear appropriate religious and cultural dress (for example, clerical collars, head scarves, skullcaps, turbans, burqa, hijab) unless it creates a health and safety risk to them or any other person, or otherwise breaches this policy.

For operational and health and safety reasons, employees of the Company may have to be flexible in some circumstances. However, the Company's policy is to ensure that any such restrictions regarding clothing to be worn in an operational environment are genuine requirements on grounds of operational effectiveness or health and safety.

Where necessary Senior Management or the office can give further information and guidance on cultural and religious dress in the workplace.

Reasonable Adjustments due to Disability

If you have a condition that is regarded as a disability, the Company will be as flexible as possible by discussing any reasonable adjustments with you so that the workplace is comfortable and accommodates your requirements.

This will also include any adjustments to the dress code followed by the Company. If you would like to discuss any adjustments, you should talk to your line manager in the first instance.

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Harassment

Harassment is defined as unwanted conduct which can be physical, verbal or non-verbal that either violates a person's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person. It may be related to gender, gender reassignment, race, disability, sexual orientation, marriage or civil partnership, part time status, age, religion or belief, colour, ethnic origin, nationality or national origin or trade union membership or any personal characteristic of the individual. It may be persistent or an isolated incident. It can take many forms, from relatively mild banter to actual physical violence.

You may not always realise that your behaviour constitutes bullying or harassment but you must recognise that what is acceptable to one person may not be acceptable to another.

We have a separate [Bullying, Harassment & Stalking Policy](#).

Procedure for Dealing with a Complaint of Unlawful Discrimination

Complaints about, or reports of, discriminatory behaviour or harassment should be made through the [Company Grievance Procedure](#).

Complaints should be raised as soon as possible so that the matter can be dealt with quickly. The matter should be raised first with the complainant's line manager. If this would cause embarrassment or if the complainant feels it inappropriate, for example if the line manager is the subject of the complaint, then you should raise the matter with another, possibly more Senior Manager.

If you experience any discriminatory behaviour from a third party such as customers or clients, you should raise the matter immediately with your line manager or any other Manager present at the place of work. The matter will be treated seriously and the Manager will carry out a full investigation.

Accusation of Unlawful Discrimination

Any accusations of unlawful discrimination will be investigated fully by us. As part of the investigation, you will be given every opportunity to answer the allegation and provide an explanation of your actions.

Once the investigation is complete, if we find that no unlawful discrimination occurred, no further action will be taken. However, if we decide that your actions amount to unlawful discrimination, you may be subject to disciplinary action up to and including summary dismissal for gross misconduct.

If, after the investigation is complete, it is found that the claim is false or malicious, disciplinary action may be taken against the employee who raised the complaint.

Equal opportunities practice is constantly developing as social attitudes and legislation changes. The Company will keep its policies under review and will implement changes where these could improve equality of opportunity.

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Victimisation

If you are victimised because you have supported another employee who has a protected characteristic, you will have the same protection as if you had that protected characteristic.

For example, one employee gives a statement confirming that they witnessed the other employee being harassed due to his or her race. The witness is then victimised, and pressure is brought in an attempt to get him or her to withdraw the statement. The witness will then be protected in the same way as the original employee who was being harassed.

Signed:



Steven Deans
Managing Director
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