

EQUAL OPPORTUNITIES AND DIGNITY AT WORK POLICY

1 Policy Statement

The company is committed to the principles of equal opportunities and eliminating discrimination in every aspect of the work of the organisation. We will strive to ensure that no individual or group is treated more or less favourably than others on grounds of gender, race, colour, age, ethnic/national origin, religious or political beliefs, disability, marital status, family circumstance, sexual orientation, spent criminal convictions or for any other reason, or will be disadvantaged by any conditions of employment or requirements that cannot be justified as necessary on operational grounds.

It is our express intention to treat employees with respect and dignity and treat them fairly with regard to all assessments, choices and procedures. Striving to ensure that the work environment is free from harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment.

This policy is intended to assist the company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

The policy is applicable to all employees, clients, suppliers and contractors, whether permanent or temporary.

2 Equal opportunities in employment

The company will strive to avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

3 Recruitment 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 experience, abilities and qualifications. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.

4 Training and promotion

The company will provide training to managers* and others likely to be involved in recruitment or other decision making, where equal opportunities issues are likely to

arise. Managers will be responsible for ensuring they actively promote equal opportunity within the department for which they are responsible.

** Manager in this context relates to any individual with people management responsibility, regardless of grade or role.*

5 **Terms of employment, benefits, facilities and services**

All terms of employment, benefits, facilities and services will be reviewed from time to time in order to ensure there is no unlawful discrimination on any prohibited grounds.

6 **Equal pay**

The company is committed to equal pay in employment. In order to achieve this, the company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

7 **Part-time employment**

Part-time work is desirable for many people and can be of advantage to the company. It is our policy to create opportunities for part-time work or job share, where possible, and to ensure that our part-time employees receive fair treatment.

The company will seek to ensure that:

- jobs or areas are identified where part-time employees could be introduced;
- job sharing and similar schemes are considered at all levels; and
- part-time workers are recruited to the jobs as so identified.

8 **Fixed term**

The company may, on occasion, make use of temporary or fixed-term staff. In these circumstances, any individual engaged on a fixed-term contract will be entitled to terms and conditions of employment that are no less favourable on a *pro rata* basis than the terms and conditions of a comparable established employee, unless there is an objective reason for offering different terms.

9 **Dignity at work**

The company is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.

Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

Bullying is offensive intimidating, malicious or insulting behaviour; an abuse or misuse of power, which is meant to undermine, humiliate or injure the person on the receiving end. Examples of bullying would include picking on someone or setting him or her up to fail or making threats or comments about someone's job security without good reason.

Harassment is unwanted conduct related to sex, race or ethnic or national origins, disability, sexual orientation, religion or belief, age or any other personal characteristic which:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating his or her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her, even if the person responsible for the conduct did not intend this effect.

Examples of harassment would include: physical conduct ranging from unwelcome touching to serious assault, unwelcome sexual advances, demeaning comments about a person's appearance, unwelcome jokes or comments of a sexual, racial or any other nature, the use of obscene gestures, and the open display of pictures of objects with sexual or racial overtones, even if not directed at any particular person, eg, magazines, calendars or pin-ups. Please note this list is not exhaustive.

- 10 Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a 'joke' may offend another person. Everyone has the right to decide what behaviour is acceptable to him or her and to have his or her feelings respected by others. An individual has the right to decide that they consider the behaviour unacceptable at any time, that is, even if that individual had previously been seen to accept that behaviour; they can decide they no longer find it acceptable. Behaviour which any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, eg, certain 'banter', flirting or asking someone for a private drink after work. In these cases, first-time conduct that unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to him or her.

A single incident can be harassment if it is sufficiently serious.

11 **Dealing with a complaint**

If you consider that you may have been unlawfully discriminated against, you may use the company's grievance procedure to make a complaint.

If you think you are being bullied or harassed, you may be able to sort out matters informally. The person may not know that his or her behaviour is unwelcome or upsetting. You may feel able to approach the person yourself, or with the help of someone else at the company. You should tell the person what behaviour of his or hers you find offensive and unwelcome, and say that you would like it to stop immediately.

If, however, you feel unable to take this course of action, or if you have already approached the person to no avail, or if harassment is of a very serious nature, you may elect to raise a formal complaint. Formal complaints should be raised with your manager (or the manager's manager if the person complained about is the direct manager).

The company will not ignore or treat lightly grievances or complaints of discrimination or harassment and all allegations will be dealt with seriously, confidentially and speedily.

You have the right to be accompanied by a work colleague or trade union representative of your choice at any meeting dealing with your grievance. You will be kept informed of the general progress of the process of investigation and any disciplinary proceedings.

You can speak in confidence to any member of the HR team regarding any issue you may have in relation to equal opportunities, bullying or harassment.

12 **Your responsibilities**

Employees have a duty to co-operate with the company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment, bullying or victimisation. 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 policy will be treated as potential gross misconduct. Employees should also bear in mind that they can be held personally liable as well as, or instead of, the company for any act of unlawful discrimination.

Employees should draw the attention of their manager to suspected discriminatory acts or practices or suspected cases of harassment. Employees 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.

However, if it is established that an employee has made a deliberately false or malicious complaint against another person, disciplinary action can be taken against that employee.

13 **Monitoring and review**

This policy will be monitored periodically by the company to judge its effectiveness and will be updated in accordance with changes in legislation.

The company will regularly monitor the effects of selection decisions and practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

This policy, like the one it replaces, is not contractual in nature but merely a statement of current intention on the part of the company, which it can change with or without consultation.

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22.1.08