

Equal Opportunities and Diversity Policy

This is a non-contractual policy

Created: May 2022
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Policy Aims

This policy aims to:

- ensure that we are clear about equal opportunity and manage in a professional and lawful way
- set out the procedures that the company will implement in relation to equal opportunities management.

Policy Scope

Equality and diversity considerations underpin all activities within the company. This includes recruitment and selection, pay and benefits and training and development.

The core purpose of this policy is to eliminate discrimination (definitions appear later in this policy) in employment and to promote equality of opportunity in employment. In doing so, we are respectful of differences and embracing of the opportunities that diversity offers.

The Equality Act 2010 makes it unlawful to discriminate against people with a 'protected characteristic' (previously known as equality strands / grounds). This extends to direct or indirect discrimination in terms of these protected characteristics:

- age
- disability (including mental health)
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including ethnic origin, colour, nationality or national origin)
- religion or belief (including philosophical belief)
- sex
- sexual orientation.

All employees at all levels are encouraged to act fairly and prevent discrimination. The company actively encourages the employment, promotion and training of employees and potential employees from all sectors of the community and values the different skills, ideas and opinions that a diverse workforce can offer.

Procedures

Recruitment and Promotion

Advertisements for posts will give sufficiently clear and accurate information to enable potential applicants to assess their own suitability for the post. Information about vacant posts will be provided in such a manner that does not restrict the audience to a particular sector of the community.

Recruitment literature will not imply a preference for one group of applicants unless there is a genuine occupational qualification which limits the post to this particular group, in which case this must be clearly stated.

Where appropriate, vacancies will be circulated internally. The company reserves the right to recognise merit and reward individuals with promotion in a fair manner. All descriptions and specifications for posts will include only requirements that are necessary and justifiable for the effective performance of the job.

All selection will be thorough, conducted against defined criteria and will deal only with the applicant's suitability for the job. Where it is necessary to ask questions relating to personal circumstances, these will be related purely to job requirements and asked of all candidates. No questions in relation to health will be asked of the applicant prior to a job offer being made.

Employment

The company will not discriminate on any basis in the allocation of duties between employees employed at any level with comparable job descriptions. The company will put in place any reasonable measures and/or adjustments within the workplace for those employees who become disabled during employment or for disabled appointees.

All employees will be considered solely on their merits for career development and promotion with equal opportunities for all.

Training

Employees will be provided with appropriate training regardless of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation, gender status or religion.

All employees are encouraged to discuss their career prospects and training needs with the company.

Employee Rights and Responsibilities

Employees have the right not to experience unlawful discrimination in the workplace. They also have a responsibility to understand this policy and help the company implement it.

All employees have a duty not to discriminate against each other and not to help anyone else do so.

Visitors and Suppliers

Employees must not discriminate against any of visitors or suppliers. Equally, the company expects visitors and suppliers not to discriminate against employees and the company will take appropriate action against any visitor or supplier found to have done so.

Disabilities and Reasonable Adjustments

We recognise our legal duty to make reasonable adjustments to accommodate employees and visitors. However, there may be times when required adjustments may be considered unreasonable. In these instances, it can be lawful to refuse to make them.

Whether an adjustment is reasonable depend on an assessment of factors including:

- is it practical to make?
- do we have the resources to pay for it?
- will it be effective in overcoming or reducing the disadvantage in the workplace?
- will they have an adverse impact on the health and safety of others?

Specialist advice will be sought if there is any doubt whether an adjustment can be considered as reasonable.

If you experience difficulties within your employment because of your disability, you should contact your manager to discuss any reasonable adjustments that would help minimise the difficulty. Your manager will consider requests for reasonable adjustments and may seek specialist advice.

Each request for reasonable adjustments will be considered on its own merits. A request for reasonable adjustments from you must:

- not be a reason not to promote you if you are the best person for the job without adjustments in place
- not be a reason to dismiss
- be considered in relation to every aspect of your job provided the adjustments are reasonable to make.

When Discrimination Arises

If an employee believes they may have been discriminated against, they must advise a Director. They can speak informally with a Director or with the HR advisor. If they want to make a more formal complaint, they are encouraged to raise the matter through the Grievance Policy. If an employee believes there has been any bullying or harassment then they should raise the matter through the Dignity at Work policy.

Allegations of potential breaches of this policy will be treated seriously. Employees 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 the Disciplinary Policy.

Acting in a Discriminatory Way

If, after investigation, it is decided an employee has acted in breach of this policy they may be subject to disciplinary action up to and including dismissal. This applies to the most senior levels of management as well as to all other employees.

Definition of Discrimination

Discrimination can be direct or indirect. Both forms of discrimination must be avoided.

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic.

Associative discrimination is discrimination against a person because they have an association with someone with a particular protected characteristic.

Perceptive discrimination is discrimination against a person because the discriminator thinks the person possesses a protected characteristic, even if they do not in fact do so.

Indirect discrimination occurs where a policy, rule or procedure at work applies to everyone but has a disproportionate impact on people with a protected characteristic.

Allyship

As a result of movements like #metoo and Black Lives Matter, we are increasingly aware of the unfairness that people experience in their lives as a result of characteristics such as their ethnicity, sex, gender and so on. For example, racism is a lived reality for most ethnic minorities in the UK. A recent YouGov survey revealed that two-thirds of black Britons have had a racial slur used against them or have had people make assumptions about their behaviour based on their race.

We are actively examining our policies in an ongoing endeavour to improve fairness using the understanding that “inequity is a problem of bad policy, not bad people”. We believe that if the right policies are in place, “bad people” will not have the opportunity to create a discriminatory work environment.

We will do whatever we can to ensure we have a diverse workforce, with minority groups appropriately represented in leadership roles.

Actions for the Company

As an employer, we are in a unique position to influence our organisation and have a far-reaching impact on how people feel at work, and subsequently, the productivity and value that employees bring to their job. The steps below set out what we ask our team do to positively influence fairness.

1. Recognise Advantages

The first step for an ally is to accept that they may have benefited from aspects of life that are inaccessible to people from minority backgrounds.

It is important to remember that this concept does not assert, for example, in the case of ethnicity, that white people have easy lives or that their accomplishments are unearned, but rather acknowledges that white people may have greater access to power and resources than those from ethnic minority backgrounds.

2. Be Ready to be Vulnerable

Being an ally is not an easy task. It requires courage to accept truths outside of lived experience, reflect on your own biases, and speak up when no one else will. Allies will likely make mistakes, which are an opportunity to learn and change their approach, to ensure words and actions make a difference.

3. Be Curious

There is a chasm between people's lived experience at work, based on their personal characteristics.

In the case of ethnicity, Business in the Community (BITC)'s 2018 Race at Work survey showed that 33% of black employees believed their ethnicity would be a barrier to their next career move, in stark contrast to just 1% of white employees.

This difference not only points to existing inequalities, but also illuminates why anti-unfairness at work presents a colossal challenge. The lived realities between employees are so vastly different that it can be extremely difficult for those who have not experienced discrimination to empathise and truly engage with this issue.

It is challenging to act with conviction without building a foundation of understanding and empathy first. There are opportunities to learn about inequality everywhere – not just through countless books, documentaries, and podcasts, but also through having open conversations with the diverse people in the workplace.

4. Be an Active Bystander

We expect our employees to call out unfairness and aggression and to ask tough questions. If you notice your colleagues being continuously interrupted, speak up and bring them back into the conversation.

We have a zero-tolerance policy in relation to discrimination and we hold people accountable for bullying and harassment.

5. Bring Diverse People to the Decision-Making Table

‘There is a difference between being invited to the room and sitting at the table.’ Being in the room means colleagues have been communicated with and are aware of our decision-making processes. This is important and has its place, but it does not ensure that their voices are heard.

We actively encourage the voices of minority colleagues to be amplified by engaging them in decision-making processes. Sitting at the table, and inviting individual’s contributions as part of the discussion, means their unique perspective is heard and valued.

6. Get Comfortable Talking About Diversity

We expect our employees to create a positive environment in which people’s differences and privacy are respected but are also not a cause of awkwardness.

Trans-Inclusivity

In order to create a workplace that is as inclusive as possible, we have identified a set of four basic principles to address transgender issues.

1. Toilets

Our toilet facilities are gender neutral and therefore, we believe we are providing the most fair and discreet options for all employees, free from the potential for sexual harassment or differentiation.

2. Work Attire

We have a gender-neutral work attire policy which allows employees the freedom of expression, applying the same requirement for ‘smart casual’ work clothes to all.

3. Pronoun and Name Usage

We will provide for and pay attention to everyone’s preferred names and pronouns as we recognise that many trans people identify on the traditional binary scale—as either male or female—and thus use *he*, *him*, and *his* or *she*, *her*, and *hers* as pronouns. Yet many others who also fall under the broad category “trans”—such as genderqueer, gender-fluid, and nonbinary individuals—use alternative pronouns, such as *they*, *them*, and *theirs* or *ze*, *zir*, and *zem*.

We will keep records of employees’ chosen names and correct pronouns; this helps ensure that whenever possible, appropriate terms will be used for personnel and administrative purposes, such as directories, email addresses, and business cards.

We encourage all employees to use email signatures that include their desired names and pronouns; this enables people to learn those names and pronouns and cultivates awareness of the varying gender identities that colleagues may possess.

When at work, we accept that a onetime slipup—such as using an incorrect pronoun for a colleague who has recently transitioned—may be considered an honest mistake (in this case, one should apologize, move on, and make sure to get it right the next time.)

Supporting Gender Transition

We acknowledge that transitioning is not a single event but, rather, a *process*. Someone deciding to transition chooses what that process will look like and how long it will take. A transition may involve gender-confirmation surgery (not all trans people undergo medical procedures). Some gender-fluid individuals spend their lives transitioning between and within various gender expressions, as they continually reinterpret and redefine themselves.

We will ask employees what they need at work during their transitions and how they would like the process handled. Only by listening to and collaborating with them can we ensure that people are not inadvertently “outed” without permission or before they’re ready and that we are supporting them as much as we can.

Records

Records of equal opportunities matters will be retained and kept confidential.