

Schedule 5: Equal Opportunities Policy

Policy Statement

The Company is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, religion or belief, sex or sexual orientation ("Protected Characteristics").

The Company is also committed to promoting equal opportunities in the provision of goods, facilities and services to the public. Members of the public will not be subjected to discrimination, victimised or harassed when being provided with goods, facilities and services on grounds of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

This policy sets out the Company's approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

If you are disabled or become disabled, the Company would encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

Application of the Policy

All terms and conditions of employment and related benefits shall be non-discriminatory, except in cases where there is a legal requirement that the job holder is of a specified gender or where health and safety requirements apply. Equal consideration will be given to all employees for training and development.

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, refusing to employ a woman because she is pregnant.
- **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring employees to have held a driving licence for 10 years may be indirect age discrimination. Such a requirement would be discriminatory unless it can be justified.
- **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It does not matter whether or not this effect was intended by the person responsible for the conduct.
- **Victimisation:** occurs where an employee is subject to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so.
- **Associative Discrimination:** is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and (according to guidance from the Government and Acas) pregnancy and maternity).

- **Perceptive Discrimination:** is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).
- **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Recruitment and Selection

All applicants for employment and all employees applying for alternative positions or promotion within the Company shall be assessed according to their skills, experience and suitability to do the job. Job advertisements used will be non-discriminatory and should avoid stereotyping or using wording that may discourage particular groups from applying. Similarly, the publications in which advertisements are placed will be selected to target a diverse section of the labour market.

Recruitment, promotion and other selection exercises (including redundancy selection) will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Health or disability questions should only be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes. In addition, job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check.

Training

Equal consideration will be given to all employees for training and development.

Part-Time and Fixed-Term Work

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Breaches of this Policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through the Company's Grievance Procedure or the Company's Bullying and Harassment Policy. Complaints will be treated in confidence and investigated as appropriate.

You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

Implementation and Monitoring

To achieve the Company's policy of promoting equality of opportunity, management and supervisory personnel will receive equal opportunities training. The aim of this training will be to develop equal opportunities and provide information skills and advice so as to ensure the effective implementation of the Company's equal opportunities policy.

The Company will monitor the equal opportunities policy and progress in achieving its objectives via audits. Where barriers to equal opportunities are identified, any necessary changes to this policy will be made.

The HR Officer is responsible for this policy and any necessary training on equal opportunities.

Access to Information and Premises

The Company will seek to ensure that information is made available to our customers and employees in alternative formats as required and will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors.

Remedial Procedure

If you believe that you have been subjected to discrimination on any grounds you are encouraged to discuss the matter informally with the HR Officer. You are also entitled to raise a formal complaint at any time. In such circumstances, you should invoke the Company's Grievance Procedure.



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