



GROUP EQUAL OPPORTUNITIES POLICY

Group Equal Opportunities Policy

This document should be read in conjunction with the Group's Equality & Diversity Policy and forms part of the induction process. Employees should be directed to the intranet to view these policies in full.

Group policy is to provide equal opportunities in recruitment, training and promotion whatever the race, colour, ethnic or national origin, religion, gender, sexual orientation, age, marital status, political beliefs, membership or non-membership of a trade union or disability of an employee, having regard to the individual's aptitudes and abilities and the requirements of the job.

Abuse or harassment involving any of these factors is strictly forbidden. Discrimination or failure to observe proper standards will be treated seriously by the Group.

Failure to observe the equal opportunity policy will normally result in disciplinary action being taken, including summary dismissal in the most serious cases.

Responsibility for Policy

The Chief Executive and Executive Committee of the organisation fully supports the principles of Equal Opportunity for all across the Group and will not tolerate non-compliance from any employee. On a day to day basis managers will be responsible for ensuring that the Group's Policy is implemented within their own sphere of operation and will deal with any matter arising or refer it to the appropriate Senior Manager or Director. The Head of Human Resources will be responsible for specialist advice, training, setting guidelines for policy implementation and any necessary revision following its review.

Employees' Responsibility

Each employee of the Group has a responsibility and a role to play particularly in the day to day human relationships at their place of work. This is the foundation on which the Group's Equal Opportunity Policy must be built and employees' co-operation in the measures being adopted is vital to its success.

Equal Opportunity Grievance

If you believe that the Equal Opportunity Policy is not being followed, you can raise the matter informally and see if that resolves the issue. If you think that an informal approach is not appropriate, or you have tried it and it has not worked, you should raise the matter through the Grievance Procedure.

You may always raise matters either formally or informally. It is helpful to raise these problems at an early stage.

Sex and Race Discrimination

Direct discrimination

Under the Sex Discrimination Act 1975 and the Race Relations Act 1976 direct discrimination occurs where one individual treats another individual less favourably on the grounds of their sex or race than he treats or would treat other persons.

Indirect discrimination

A claim of indirect discrimination arises when an employer applies a requirement or condition generally, but which is such a proportion of persons from one racial group who can comply with it is considerably smaller than the proportion of persons not of that racial group who can comply with it.

Disability Discrimination

Under the Disability Discrimination Act 1995, disability discrimination occurs if for a reason which relates to the disabled person's disability an individual:

- Treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply, and
- The employer cannot show that the treatment in question is justified

The company will not discriminate against a disabled job applicant or employee on the grounds of disability:-

- In the arrangements i.e. Application form, interview and arrangements for selection for determining to whom a job should be offered; or
- By refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- In the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- By subjecting him or her to any other detriment (detriment will include refusal of training, transfer, demotion, reduction of wage or harassment)

The Group will, accordingly make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff.

Age Discrimination

The Group will not include any age criteria or other subjective criteria in job specifications and every attempt will be made to recruit on the basis of competence and skill not age.

The Group is committed to recruiting and retaining employees whose skills, experience and attitude are appropriate to the requirements of various positions regardless of age.

We will request age as part of the recruitment process but information will not be used in any detrimental way and is for compilation of personal data, which the Group holds on all employees.

Part Time Workers

This Equal Opportunities Policy also covers the treatment of those employees who work on a part-time basis. We recognise that it is an essential part of this policy that part-time employees are treated on the same terms 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 any pension schemes to which they may be eligible by virtue of their contract of employment.

We also recognise that part-time employees must be treated the same as full time employees in relation to training and redundancy situations.

Gender Reassignment

The Group recognises that an employee may wish to change their gender during the course of their employment with the Group. We will support any employee through the reassignment provided that full medical counselling has been undertaken and we have access to any relevant medical reports. We will make every effort to protect the employee undergoing the reassignment within the workplace.

All employees will be expected to comply with the policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary sanction. Where an employee is engaged in work where the gender change imposes genuine problems, the Group will make every effort to reassign the employee to an alternative role in the Group.

Any employee suffering discrimination as the result of their gender reassignment should make recourse to the Grievance Procedure. Any discrimination complaint will be investigated fully.

Recruitment

The Group will make it clear that it is an equal opportunity employer. In the selection process any details relating to ethnic origin and age will be removed and this information will only be used for monitoring purposes and not form part of the selection documentation.

The Group will:-

- 1) Continue to review methods of recruitment to ensure that no potential candidate is unfairly excluded from employment consideration.
- 2) Ensure that where tests are applied these apply equally to all applicants.

Employee Appraisal

The Group is anxious to ensure that:-

- 1) Promotion and transfer procedures are not being applied in a discriminatory manner.
- 2) The conduct of job/employee appraisals and reviews do not have the effect of being discriminatory.
- 3) The criteria for assessing individuals does not give rise to any discrimination.

Grievance Procedure

The Group has a responsibility to promote harmonious working relationship between employees. If an employee considers that the Group's Equal Opportunities Policy and procedures are not being properly applied or suffers abuse or provocation, the employee should raise the matter through the Group's recognised procedure.

Sub Contractors and Suppliers

Through our comprehensive quality procedures we ensure that Sub-Contractors provide a copy of their Equal Opportunities Policy. They are required to provide evidence of how they communicate their policy to their employees, how they train their employees in equality matters and how they monitor their recruitment, training and other relevant policies and procedures in respect of equality and diversity issues.

Monitoring and Reviewing Policy

The Group will continue to review and examine its policy in the light of legislation and codes of practice, taking appropriate action where reasonable.

Guidelines

The Group will meet all statutory obligations under relevant legislation and, where appropriate anticipate future legal requirements signalled under EU Directives. The Company policy is guided by (This list is not exhaustive):

- *Equal Pay Act (1970)*
- *Sex Discrimination Act (1975)*
- *Race Relations Act (1976)*
- *Disability Discrimination Act (1995)*
- *Human Rights Act (1998)*
- *Race Relations (Amendment) Act (2000)*
- *The Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000*
- *EU Equal Treatment Framework Directive (2000/78)*
- *The Sex Discrimination (Gender Reassignment) Regulations 1999*
- *The Employment Equality (Age) Regulations 2006*

- *Codes of Practice issued by the Equal Opportunities Commission and the Commission for Racial Equality together with the Codes of Practice on Disability and Age Diversity. Whilst these codes are not legally binding the company supports them*
- *Equality Act 2010*