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1. General Philosophy

The Company is committed to providing equal opportunities in employment to all employees and applicants for employment and thereby demonstrates to its customers, employees and all other stakeholders that its employment decisions are fair, unbiased and objective.

Equality and diversity in the Company means freedom from discrimination on the grounds of a protected characteristic. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. It means fair and unbiased treatment of all employees and a workplace where staff are treated as individuals and where progression and development are based on merit, competency and potential.

The Company seeks to develop policies, practices and facilities that actively promote fairness and opportunity.

2. Aim and Scope

The Company has a duty to ensure that its employment practices are legal without any form of unlawful discrimination.

Direct discrimination means treating a person less favourably because of prejudice against the particular group to which they belong e.g., "I never employ women because they always leave to have babies".

Indirect discrimination arises when requirements or conditions are set - perhaps unintentionally - with which a particular group finds it harder to comply than other groups. For example, to require a candidate to be about 30-35 years of age in an advert without good reason may be deemed indirect sex discrimination; some women are statistically less likely to be able to comply as women of childbearing age fall within that definition. Human Resources will advise and offer guidance to managers on how best to strike a balance between honestly describing the characteristics of the ideal candidate and keeping within the law.

Associative discrimination is direct discrimination against an individual because they associate with an individual who has a protected characteristic.

Perceptive Discrimination is direct discrimination against an individual because others think they possess a protected characteristic. It can apply even if they do not actually possess it.

Harassment is unwanted conduct related to a protected characteristic which makes the individual feel uncomfortable in their own environment e.g. violated, humiliated or intimidated. Individuals can also complain even if they do not possess that characteristic.

Victimisation is treating someone less favourably because they've complained or been involved in a complaint related to a protected characteristic.

For more details on harassment and victimisation please refer to the Dealing with Allegations of Harassment and Bullying Policy (GP-HR-304).

This Equality and Diversity Policy applies to all prospective and existing employees - regardless of position or status - and to their terms and conditions of employment including recruitment, development, career planning, promotion, transfer, compensation, benefits, educational assistance, redundancy, termination and retirement.

3. Policy Framework

Because the Company values the individual contribution of people, irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, it seeks to employ a workforce which reflects the diverse community at large. Additionally, it seeks to treat all employees with dignity and respect and provide a working environment free from discrimination or harassment and bullying (see Section 3 Employee Relations, Dealing with Allegations of Harassment and Bullying – GP-HR-304).

The Company's equality and diversity objectives are as follows:

- **Recruitment.** Recruitment procedures should be designed to reach all eligible groups, to encourage applications from all suitable candidates and to ensure the selection process is based on the ability of the applicant to perform the job advertised, basing decisions on Merit, Competence and Potential;
- **Induction.** All employees should be made aware of the Company's Equality and Diversity Policy as part of the induction process;
- **Development.** No employee should be given less or more favourable access to training on the basis of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation;
- **Career development.** Career development and promotion opportunities should be regularly reviewed and, if necessary, revised to ensure that individuals are promoted solely on the basis of their merits and abilities;
- **Discipline / Grievance.** Grievance and disciplinary procedures should be kept under review, to ensure all groups are treated on the same basis;
- **Terms and Conditions.** The Company's terms and conditions of employment - including pay - should be kept under review to ensure that no group is less or more favourably treated on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Pay secrecy is unlawful;
- **Monitoring.** Personnel data should be periodically monitored and analysed to help identify possible areas of discrimination in any aspect of policy implementation.

The Company will not accept acts, which breach this policy or its equality and diversity objectives. All instances of such behaviour, or alleged behaviour, will be taken seriously and be fully investigated. Individuals who are in serious breach of the policy on Equality and Diversity may be subject to the Company's Disciplinary Procedure. In extreme cases this may include dismissal.

Individuals who feel that they have been unfairly discriminated against on any of the grounds identified above should initially raise the matter with their manager or, if they feel unable to do so, with Human Resources. In order to facilitate the investigation and resolution of the alleged incident, the issue should typically be raised immediately but no later than 3 months from the date of the occurrence. In the event that discussions with the manager and Human Resources does not produce

a satisfactory outcome, then the employee has the right to use Company's Grievance Procedure (see Section 3 Employee Relations, Grievance Procedure – GP-HR-303).

The Company does not advocate so-called "positive" or "reverse" discrimination. The appointment of any individual will be based on Merit, Competence and Potential of the individual and related to justifiable job requirements.

Should an existing employee become disabled every effort will be made to retain him / her within the workforce, wherever reasonable and practicable. The Company will install facilities and / or make appropriate adjustments and modifications in existing premises for people with disabilities whenever practicable to do so.

Managers can seek advice on the advancement of equality and diversity within their department and / or for help and advice in individual cases from Human Resources. Conversely, managers should keep Human Resources informed on the progress of equal opportunities and equality and diversity initiatives in their area in order that best practices can be 'cascaded' across the Company wherever appropriate.

4. Cross References

Section 1 - Employee Resourcing, Internal Recruitment (GP-HR-402)

Section 3 - Employee Relations, Disciplinary Procedure (GP-HR-302)

Section 3 – Employee Relations, Grievance Procedure (GP-HR-303)

Section 3 - Employee Relations, Dealing with Allegations of Harassment & Bullying (GP-HR-304)

Relevant legislation: The Equality Act 2010