

## EQUAL OPPORTUNITIES AND DIVERSITY POLICY

We are an equal opportunity employer and are committed to ensuring that the terms and conditions of employment for you and potential employees are equitable and non-discriminatory. This means that job applicants, employees, suppliers and clients will be treated fairly irrespective of any of the 'Protected Characteristics' as defined by the Equality Act 2010. The protected characteristics are race, religion or belief, age, disability including mental health, gender re-assignment, marriage and civil partnership, pregnancy and maternity, sex and sexual orientation.

Stakeholders and sub-contractors who contract on our behalf or who deliver services are also required to comply with the policy. All clients and users of our services will be entitled to be treated with respect and for their wishes, needs and choices to be taken into consideration.

Our duty to our clients and users extends to protecting them from discrimination from others and all employees, officers, stakeholders and sub-contractors will ensure that no discrimination is tolerated arising from 3rd parties during or in connection with service delivery. We will seek to promote equal opportunities and prevent harassment and bullying by publicising and communicating this policy; by providing appropriate training and guidelines for those with designated responsibilities and by raising awareness through employee development.

Further, we will continually monitor our policies and practices to ensure that these principles are upheld. It is your right to be treated with dignity and respect, irrespective of any of the protected characteristics, which in turn will be conducive to performance, self-development and career advancement. Everyone, regardless of job role, has a responsibility to implement this policy.

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, rejecting a job applicant because of their religious views or because they might be gay.
- 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 a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- Harassment - harassment is defined as any hostile, unwanted unreasonable and/or offensive conduct related to a relevant protected characteristic, which adversely affects a person's dignity, self-confidence and well-being and creates a hostile environment and which leads to that person feeling intimidated, degraded or humiliated. A person is also protected from harassment because of perception and association.
- Victimisation - victimisation occurs when an employee is subject to a detriment because of something they have done, under or in connection with, asserting their rights under any employment legislation or regulations. This will not apply if the complaint was maliciously made or if an individual supports an untrue complaint.
- 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.

**Monitoring**

All employees will be asked to complete a form providing information regarding their age, sex, race, ethnic origin and whether they suffer from any disabilities. This form will be used solely for the purpose of monitoring the effectiveness of our equal opportunities policy and to ensure that we meet our obligations as an Equal Opportunities employer. It will not be taken into consideration of the person's suitability for the role.

**Procedure for discriminatory conduct**

Any employee may use the grievance procedure to complain about discriminatory conduct. The complaint will be taken seriously, thoroughly investigated and considered based on the facts of the investigation. No individual will be penalised for raising such a grievance unless it is found to be patently untrue and made in bad faith. If the matter relates to harassment or bullying of any kind the anti-harassment and bullying procedure should be followed.

Any employee who discriminates against any other employee or client because of a protected characteristic will be subject to our disciplinary procedure as set out in the grievance and disciplinary policy. In serious cases where such behaviour has been deemed to constitute gross misconduct it will result in summary dismissal in the absence of mitigating circumstances. This statement should be read in conjunction with the anti-harassment and bullying procedure set out in this policy.

We recognise that our employees, officers, stakeholders, and subcontractors are in turn entitled to respect for their rights. We will not tolerate discriminatory action against anybody employed by us or acting on our behalf. We therefore require you to notify your line manager in the event of inappropriate words, actions, or behaviour by any client or user of our services.

In the event of a complaint arising, your line manager will advise as to the action to be taken. In emergency situations where advice of authority is not available, you are to act as you think right in the circumstances. If that includes the termination of our services or terminating an activity such as a training course, then you are authorised to take such steps.

**Positive action on equal opportunities**

We will regularly monitor the composition of the workforce and of job applicants. Should inequalities become apparent lawful positive action will be taken to redress the balance including such measures as:

- Advertising jobs in ethnic or particular interest publications as appropriate.
- Encouraging under-represented groups to apply for suitable posts or undergo training.
- Contacting disabled candidates via the local job centre.
- Considering whether any reasonable adjustment can be made to work premises or the working arrangements to accommodate a disabled employee or job applicant.
- Introducing assertiveness training.

**Anti-harassment and bullying procedure**

As well as our commitment to equal opportunities, we are committed to providing a work environment for everyone, which is free from harassment or bullying because of a protected characteristic. This may include embarrassment, intimidation, threats or discrimination.

Reasonable measures will be taken to ensure that no employee is subject to harassment or bullying. In recognition of these principles, we do not condone any conduct, which may be construed as sexual harassment.

**Sexual harassment**

Reasonable measures will be taken to ensure that no employee is subject to harassment or bullying. In recognition of these principles, we adopt a zero-tolerance approach to any conduct, which may be construed as sexual harassment.

The law requires employers to take reasonable steps to prevent sexual harassment of their workers. We take action to prevent sexual harassment from occurring and have clear reporting procedures for our employees to make a complaint about sexual harassment. If you have been sexually harassed, or you have witnessed sexual harassment, we encourage you to tell us so that we can deal with the matter swiftly.

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, an agent of an organisation, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour. Examples of sexual harassment include, but are not limited to:

- Sexual comments or jokes, which may be referred to as “banter”.
- Displaying sexually graphic pictures, posters or photos.
- Suggestive looks, staring or leering.
- Propositions and sexual advances.
- Making promises in return for sexual favours.
- Sexual gestures.
- Intrusive questions about a person’s private or sex life or a person discussing their own sex life.
- Sexual posts or contact in online communications, including on social media.
- Spreading sexual rumours about a person.
- Sending sexually explicit emails, text messages or messages via other social media.
- Unwelcome touching, hugging, massaging or kissing.

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws. These are outlined below. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation.

Examples of victimisation may include:

- Failing to consider someone for promotion because they have previously made a sexual harassment complaint.
- Dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint.
- Excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

This policy covers behaviour which occurs in the following situations:

- A work situation.
- A situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch, a business trip or social functions.
- Outside of a work situation but involving a colleague or other person connected to the organisation, including on social media.
- Against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role.

### **Taking action**

Any complaints of harassment or bullying should be made to your line manager who will involve the relevant people to consider your complaint. The matter will be dealt with in a discreet and confidential manner and appropriate action will be taken. It is the duty of all employees and in particular management, to ensure that the anti-harassment & bullying policy is implemented. Harassment or bullying will be taken to have occurred if a reasonable individual would feel that the behaviour was unwelcome or offensive.

Harassment and bullying are disciplinary offences that may, in the most serious cases, lead to dismissal. Individuals should be aware that in some circumstances they may be held personally liable for acts that are unlawful.

Incidents of sexual or racial harassment can be taken to amount to gross misconduct, which will be dealt with under our disciplinary policy and may lead to summary dismissal. Less serious infringements may lead to an apology from the harasser, letter of reprimand, suspension or relocation of the harasser.

In dealing with reports of harassment or bullying the following principles will apply:

- All reports will be taken seriously; treated in confidence and investigated by an individual who is independent of the situation (this may lead to an external, neutral 3rd party being appointed to investigate the complaint).
- All complaints will be progressed and dealt with according to our grievance and disciplinary procedure.
- Where we have reason to believe that there is a risk to the personal safety of the complainant or of another person, or that a criminal offence has been committed, we may take legal advice and/or inform the police before proceeding with any internal action.
- The victimisation or harassment of a complainant or the respondent, or any witnesses will be regarded as a disciplinary offence.
- Malicious complaints will be regarded as a disciplinary offence.

**Sources and methods of recruitment**

The recruitment process must result in the selection of the most suitable person for the job in respect of experience and qualifications.

**Advertisement**

Recruitment publicity must positively encourage applications from all suitably qualified and experienced people.

When advertising job vacancies, to attract applications from all sections of the community, we will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, racial group or disability;
- Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, racial group or disability;
- Avoid prescribing any requirements as to marital status;
- Avoid prescribing any requirements as to age;
- Publicise vacancies that may be filled by promotion or transfer, to all eligible employees in such a way that they do not restrict applications from employees of any particular age, race, gender, or those who have a disability;
- Not recruit new employees solely on the recommendation of an existing employee and without following due process.

**Selection methods**

The selection process will be carried out consistently for all jobs at all levels. We will ensure that this Equal Opportunities Policy is available to all employees and in particular is given to all employees with responsibility for recruitment, selection and promotion.

The selection of new employees will be based on the job requirements and the individual's suitability and ability to do, or to train for the job in question.

**Selection tests**

If selection tests are used, they will be limited to questions relating to the particular job and/or career requirements. The tests will measure the individual's actual or inherent ability to do or to train for the work or career. Thus, questions or exercises on matters that may be unfamiliar to racial minority applicants, applicants of a particular sex, or those who have a disability, will not be included in the tests if they are unrelated to the requirements of the particular job.

The tests that are used will be reviewed from time to time in order to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism.

**Applications and interviewing**

- All applications will be processed in the same way.
- The employee responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria, and of the need for their consistent application.
- All candidates must be issued with a privacy notice, in line with GDPR legislation.
- All questions that are put to the applicants will relate only to the requirements of the job.
- If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel) this will be discussed

- objectively, without detailed questions based on assumptions about race, age, sex, religion, national origin, sexual orientation, disability, marital status, children and domestic obligations.
- 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.
- 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. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

### **Promotion, transfer and training**

We will take such measures as may be necessary to ensure the proper training, supervision and instruction for all employees in order to familiarise them with our policy on Equal Opportunities, and in order to help them identify discriminatory acts or practices and to ensure that they promote equal opportunity at all times.

All persons responsible for selecting new employees, selecting employees for training, whether induction or promotion training, or for transfer to other jobs, will be instructed not to discriminate on gender or racial grounds and on the grounds of the employee's disability or sexual orientation.

Where a promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory.

The promotional system will be checked from time to time in order to assess how it is working in practice.

When a group of workers predominantly of one race, sex, or type of disability, is excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure that there is no unlawful, indirect discrimination.

Where general ability and personal qualities are the main requirements for promotion to a post, care will be taken to consider favourable candidates of all races, both sexes, and all classes of disability, with different career patterns and general experience.

### **Accessibility**

We will endeavour to ensure individuals have the facilities and assistance to work wherever the need/client dictates. If the request is reasonable, we will make adjustments to the environment where possible.

### **Disabilities**

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

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 our Grievance Procedure or Anti-harassment and Bullying 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.

Signed:

A handwritten signature in black ink, appearing to be 'D. ...', is positioned to the right of the 'Signed:' label.

Date: 01/04/2026