Equal Opportunities Policy

Our commitment

The Company is committed to providing equality of opportunity in employment and to avoiding unlawful discrimination in employment and against customers.

The senior member of staff with overall responsibility for the effective implementation of this policy is Denis O'Connell, the Managing Director. Every employee will be notified of his contact details during induction and all persons will be made aware of this policy.

This policy is intended to assist the company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated fairly, with dignity and respect, is an important aspect of ensuring equal opportunities in employment.

The Company has an open recruitment policy and in order to avoid restricting the groups which have access to job opportunities within the organisation advertises vacancies in schools, job centres, and a wide range of publications.

The Company will not tolerate discrimination directly or indirectly in recruitment or employment on grounds of sex, gender reassignment, pregnancy, colour, race, nationality, ethnic or national origins, sexual orientation or religion or belief, or because someone is married or is a civil partner.

The Company will not treat someone less favourably on grounds of disability than others without that disability are or would be treated, unless the less favourable treatment can be justified, or to fail to make reasonable adjustments to overcome barriers to employment caused by disability.

The Company will not tolerate discrimination on grounds of age in relation to employment. There will be no upper age limits on unfair dismissal and redundancy, compulsory retirement below the age of 65 and employees will have the right to request to continue working beyond the age of 65 and to have the request fairly considered.

The Company will not tolerate discrimination directly or indirectly in the provision of goods, facilities or services to customers on grounds of sex (which may include gender reassignment), pregnancy, colour, race, nationality, or ethnic or national origins.

The Company will not tolerate discrimination without justification, on grounds of disability or to fail to make reasonable adjustments to overcome barriers to using services caused by disability.

The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services.

The Company will not tolerate any form of harassment or bullying.

The Company will not victimise someone because he or she has alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Failure to comply with any of the above will result in disciplinary action or possible dismissal.

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another in comparable circumstances on a prohibited ground. An example of direct sex discrimination would be refusing to employ a woman because she was pregnant. Unlike the other forms of discrimination, direct discrimination on the grounds of age can be justified.

Indirect discrimination is where a provision, criterion or practice is applied which is such that it would be to the detriment of a considerably larger proportion of the relevant group to which the individual belongs than to others, which is not objectively justifiable and which is to the individual's detriment. An example of indirect sex discrimination could be requiring everyone to work full time unless there is a good reason, unrelated to sex, as to why the particular job has to be done on a full-time basis, since requiring everyone to work full time will normally adversely affect a higher proportion of women than men.

Harassment is where there is unwanted conduct related to one of the prohibited grounds which has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, or is reasonably considered by that person to have the effect of violating his or her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her, even if this effect was not intended by the person responsible for the conduct.

Failure to make reasonable adjustments is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

Victimisation is where someone is treated less favourably than others because he or she has alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Equal opportunities in employment

The company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

The company will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the company considers it has good reasons, unrelated to any prohibited ground of discrimination, for doing so. The company will comply with its obligations in relation to statutory requests for contract variations. The company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

The company will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems which may be identified as a result of the monitoring process.

Dignity at work

The company is committed to creating a work environment free of harassment and bullying, where everyone is treated fairly, with dignity and respect.

Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

- **Bullying** is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power which is meant to undermine, humiliate or injure the person on the receiving end.
- Examples of bullying would include picking on someone or setting him or her up to fail or making threats or comments about someone's job security without good reason.

- **Harassment** is unwanted conduct related to sex, gender reassignment, race or ethnic or national origins, disability, sexual orientation, religion or belief, age or any other personal characteristic which:

  - has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
  - is reasonably considered by that person to have the effect of violating his or her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her, even if this effect was not intended by the person responsible for the conduct.

Examples of harassment would include: physical conduct ranging from unwelcome touching to serious assault, unwelcome sexual advances, demeaning comments about a person's appearance, unwelcome jokes or comments of a sexual or racial nature or about an individual's age, the use of obscene gestures, and the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person, e.g. magazines, calendars or pin-ups.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a 'joke' may offend another person. Everyone has the right to decide what behaviour is acceptable to him or her and to have his or her feelings respected by others. Behaviour which any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to him or her e.g. touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, e.g. certain 'banter', flirting or asking someone for a private drink after work. In these cases, first-time conduct which unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to him or her.

A single incident can be harassment if it is sufficiently serious.

Dealing with Complaints of Bullying or Harassment

Informal approach

If you think you are being bullied or harassed, you may be able to sort out matters informally. The person may not know that his or her behaviour is unwelcome or upsetting. You may feel able to approach the person yourself, or with the help of someone else at the Company. You should tell the person what behaviour of his or hers you find offensive and unwelcome, and say that you would like it to stop immediately.

Using the Grievance Procedure

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the Company's' grievance procedure.

In the case of grievances about bullying or harassment, the normal grievance procedure is modified so that you can choose whether to raise your grievance with your manager or with another manager.

All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser.

You will have the right to be accompanied by a work colleague or trade union representative of your choice at any meeting dealing with your grievance.

You will be kept informed of the general progress of the process of investigation and the outcome of any disciplinary proceedings.

Confidentiality

The company will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.

Complaints made in good faith

You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint which you know to be untrue may lead to disciplinary action being taken against you.

Your responsibilities under this policy

Every employee is required to assist the company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the company, for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Training will be provided for managers and supervisors, and specifically for those involved with recruitment.

This training will involve equal opportunities awareness and non-discriminatory interview techniques.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the company disciplinary procedure. Conduct of this type will often be gross misconduct which can lead to dismissal without notice.

Monitoring and review

This policy will be monitored periodically by the company to judge its effectiveness and will be updated in accordance with changes in the law.

In particular, the company will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the company will implement them.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

This policy will comply with all appropriate, current anti-discrimination legislation.

Signed:

Denis O'Connell Date: 11/01/26

Managing Director