

EQUAL OPPORTUNITIES POLICY

1. OUR COMMITMENT

- 1.1 The Charity is fully committed to preventing discrimination and promoting equality and diversity and mutual respect in its own policies, practices and procedures and in those areas in which it has a material degree of influence. This applies to the Charity's professional dealings with staff, its suppliers, customers and other third parties.
- 1.2 The Charity aims to treat everyone with the same attention, courtesy and respect and not to discriminate or harass unlawfully because of age, disability, gender reassignment, marriage or civil partnership status, pregnancy, maternity, race, racial group, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, trade union membership or part-time or fixed-term status ("Prohibited Grounds").
- 1.3 Reasonable adjustments will be made for staff. A disability will only be taken into account where this is justified and on the basis of relevant and adequate information (see paragraph 7 below - Disability Discrimination). Age may only be taken into account where objectively justified and to the extent permitted by law.
- 1.4 This policy covers every individual working for the Charity irrespective of their status, level or grade. For the purposes of this policy:
 - 1.4.1 "Employees" means the Charity's employees, whether permanent, part-time or full-time, and whether on temporary or fixed-term contracts;
 - 1.4.2 "Other Workers" means individuals such as agency staff, consultants, casual workers and volunteers who are not Charity employees, but who work at the Charity's offices;
 - 1.4.3 "staff" means Employees and Other Workers collectively.
- 1.5 This policy is to provide guidance. It applies to, but is not limited to, advertising of jobs and recruitment and selection, training and development, opportunities for promotion, conditions of service, benefits and facilities and pay, health and safety and conduct at work, grievance and disciplinary procedures and termination of employment, including redundancy. However, this policy does not form part of your contract of employment and the Charity may amend it at any time.

- 1.6 You are also referred to the Charity's Protection from Harassment Policy, which sets out the Charity's position on bullying and harassment and gives guidance on what you should do if you consider you are or have been bullied or harassed.

2. REGULATION AND LEGISLATION

In developing and implementing this Policy, the Charity is committed to complying with all current and any future anti-discrimination legislation and associated codes of practice including but not limited to the Equality Act 2010 and any relevant amendments, replacements or re-enactments of such legislation or codes (together "the anti-discrimination Legislation").

3. FORMS OF DISCRIMINATION

- 3.1 Discrimination may be direct or indirect and it may occur intentionally or unintentionally.
- 3.2 Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the Prohibited Grounds set out in paragraph 1.2 above.
- 3.3 Indirect discrimination occurs where an individual is subject to a provision, criterion or practice which puts that individual at a particular disadvantage because of one of the Prohibited Grounds (for example, their sex or race), and the employer cannot objectively justify that provision, criterion or practice (for a reason unconnected with the individual's sex or race) as a proportionate means of achieving a legitimate aim of the employer.
- 3.4 Discrimination can also take the form of victimisation (which occurs when an employee suffers less favourable treatment because of action taken to assert legal rights against discrimination or to assist a colleague in that regard) and harassment (see the Charity's Protection from Harassment Policy). Corresponding principles apply to the other grounds of unlawful discrimination.

4. EMPLOYMENT AND TRAINING

4.1 General statement

As an employer, the Charity aims to treat all staff equally and fairly and not to discriminate unlawfully against them. This includes, for example, its arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion or transfers, conditions of service, benefits and facilities and pay, health and safety, conduct at work, grievance and disciplinary processes, demotions, termination of employment (including selection for redundancy), dress codes, references, bonuses, work allocation and any other employment related activities.

4.2 Recruitment and Selection

The Charity recognises the benefits of having a diverse workforce and aims to ensure that:

- 4.2.1 employment opportunities are open and accessible to all on the basis of their individual qualities, qualifications, availability, personal merit and best fit for the position;
- 4.2.2 selection criteria and processes do not discriminate unlawfully on the Prohibited Grounds other than in those instances where the Charity is permitted by law;
- 4.2.3 wherever appropriate and necessary, lawful exemptions (genuine occupational requirements) will apply to enable the recruitment of suitable staff to meet the special needs of particular groups;
- 4.2.4 all recruitment agencies acting for the Charity are aware of the requirement not to discriminate and to act accordingly;
- 4.2.5 recruitment procedures are kept under review to ensure that individuals are treated on the basis of their relevant merits and abilities;
- 4.2.6 job selection criteria are carefully considered to ensure they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

5. CONDITIONS OF SERVICE

- 5.1 The Charity aims to create a working environment which is free from discrimination and harassment and which respects the diversity in the backgrounds and beliefs of employees, contractors and other workers.
- 5.2 Terms and conditions of service for staff will comply with the Anti-Discrimination Legislation. Provision of working hours, maternity and other leave arrangements, performance appraisal systems, dress code, bonus schemes and any other conditions of employment will not discriminate unlawfully against any member of staff.
- 5.3 Where appropriate and necessary, the Charity will endeavour to provide appropriate facilities and conditions of service which take into account the specific needs of individual members of staff which arise from their ethnic or cultural background; gender; responsibilities as carers; disability; religion or belief; or sexual orientation.

6. TRAINING, PROMOTION AND CAREER DEVELOPMENT

- 6.1 The Charity always aims to ensure that promotion within the Charity takes place without reference to any of the Prohibited Grounds and is based solely on merit.
- 6.2 The selection criteria and processes for training and promotion will be kept under review to ensure that there is no unjustifiably discriminatory impact on any particular group.
- 6.3 The Charity aims to ensure that all of its staff have equal access to training and other career development opportunities appropriate to their experience and abilities.

- 6.4 The Charity aims to regularly monitor the composition and movement of staff at different levels to ensure equality of opportunity at all levels of the Charity. Where appropriate, the Charity aims to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.
- 6.5 The Charity aims to regularly review conditions of service, benefits and facilities to ensure that they are available to all Employees who should have access to them and that there are no unlawful obstacles to accessing them.

7. DISABILITY DISCRIMINATION

- 7.1 Any member of staff who is disabled, or becomes disabled whilst in the employment of the Charity is encouraged to tell the Charity about their condition. This is to enable the Charity to provide as much support as possible. Any Employee of the Charity or Other Worker who is disabled should advise their Line Manager of any proposals for adjustments to their working conditions or the duties of their job which they consider appropriate, or which would assist them in the performance of their duties. Their Line Manager may wish to consult with them and with their medical adviser(s) about possible adjustments. The Charity aims to ensure that careful consideration is given to any such proposals and to accommodate them where practicable and proportionate to the needs of the job. Nevertheless, there may be circumstances where the Charity will not be in a position to accommodate the suggested adjustments.
- 7.2 The Charity aims to monitor the physical features of its premises to consider whether they place disabled members of staff, partners, clients or visitors at a substantial disadvantage. Where possible, practical and proportionate, the Charity will take steps to improve access for such disabled persons.

8. THIRD PARTIES

8.1 Suppliers

All lists of approved suppliers and databases of contractors, agents and other third parties who, or which, are regarded as suitable to be instructed by those within the Charity have been compiled only on the basis of the ability of those persons or organisations to undertake work of a particular type and the Charity aims to ensure such lists contain no exclusion, restriction or preference that is unlawfully discriminatory.

9. CLIENTS/CUSTOMERS (CARE PARTNERS)

- 9.1 The Charity is generally free to decide whether to accept instructions from any particular client, but the Charity aims not to refuse to act on the basis of any of the Prohibited Grounds.
- 9.2 The Charity aims to meet the different needs of particular clients arising from its obligations under the Anti-Discrimination Legislation.
- 9.3 In addition, where necessary and where it is permitted by the Anti-Discrimination Legislation (for example, provisions relating to positive action or exemptions), the Charity will seek to provide services which meet the specific needs and requests arising from clients' particular circumstances of

characteristics in terms of age, ethnic or cultural background; gender; responsibilities as carers; disability; religion or belief; sexual orientation or other relevant factors.

10. PROMOTING EQUALITY AND DIVERSITY

- 10.1 The Charity is committed to promoting equality, diversity and mutual respect in the Charity as well as in those areas in which it has influence.
- 10.2 The Charity aims to ensure that all of its staff are informed of this Equal Opportunities Policy and that its staff are provided with equality and diversity training appropriate to their needs and responsibilities.
- 10.3 The Charity aims to ensure that all those who act on the Charity's behalf are informed of this Equal Opportunities Policy and will be expected to pay due regard to it when conducting business on the Charity's behalf.
- 10.4 In all its dealings, including those with suppliers, contractors and recruitment agencies, the Charity seeks to promote the principles of equality and diversity and mutual respect.
- 10.5 The Charity will make every effort to reflect its commitment to equality and diversity in its marketing and communication activities.

11. IMPLEMENTING THE POLICY

11.1 Responsibility

The Director is responsible for the operation of this policy.

- 11.2 Acts of discrimination against or harassment of any of the Charity's staff irrespective of their status, level or grade on any of the Prohibited Grounds by Employees or Other Workers may result in disciplinary action (or other appropriate action where the Disciplinary and Dismissal Procedure does not apply).
- 11.3 Acts of discrimination or harassment on any of the Prohibited Grounds by third parties acting on behalf of the Charity may lead to appropriate action including termination of services where appropriate.

12. MONITORING AND REVIEW

- 12.1 The policy will be monitored and reviewed on a regular basis to measure its progress and judge its effectiveness.

13. COMPLAINTS OF DISCRIMINATION

- 13.1 The Charity will treat seriously, and will take action where appropriate concerning all complaints of discrimination or harassment on any of the Prohibited Grounds made by staff or by customers, suppliers or other third parties.
- 13.2 Any Employee or Other Worker who believes that they may have been disadvantaged on any of the Prohibited Grounds listed above, is encouraged to raise the matter through the Charity's Grievance Procedure. If you believe that you may have been harassed on any of the Prohibited Grounds listed at

above, you are encouraged to raise the matter through the Charity's Protection from Harassment Policy.

- 13.3 Allegations regarding potential breaches of this Policy will be treated in confidence as far as possible and the Charity aims to investigate allegations in accordance with the relevant procedure. Staff who make allegations in good faith will not be victimised or treated less favourably as a result. Deliberate and false allegations of a breach of this Policy which are found to have been made in bad faith may, however, be dealt with under the Charity's Disciplinary and Dismissal Procedure.
- 13.4 If, after investigation, you are found or believed to have harassed any member of staff, or any other person including the Charity's visitors, customers and suppliers, on any of the Prohibited Grounds or otherwise act in breach of this Policy, you may be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The Charity always takes a strict approach to any serious breaches of this policy.

14. MONITORING AND REVIEW

- 14.1 The Charity's Board of Trustees has overall responsibility for this Policy but has delegated day-to-day responsibility for overseeing and implementing action required under it to the Director. Responsibility for monitoring and reviewing the operation of the Policy and any recommendations for change to the Policy also lies with the Director.