



NATIONAL POWER
LOCAL STRENGTH

EQUAL OPPORTUNITIES POLICY & DIVERSITY STATEMENT

The company has a positive commitment to Equal Opportunities & Diversity and the avoidance of discrimination of any kind.

The company supports the policy of equal access to, and treatment within, its employment, promotion & training programmes especially in respect of the following "Protected Characteristics".

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion and Belief
- Sex
- Sexual Orientation

To further this, the policy has been developed & communicated to all employees under the normal terms & conditions of employment, applicable to all.

We all have a responsibility to embrace & support this vision and must continue to challenge behaviour and attitudes that prevent us from achieving this. Using fair, objective and innovative employment practices, our aim is to ensure:

All employees (full time, part time, fixed term and casual), and potential employees are treated fairly and with respect at all stages of their employment.

All employees have the right to be free from discrimination, harassment and bullying of any description, or any other form of unwanted behaviour, whether based on sex, transsexual status, marital and civil partnership status, race, disability, age, political or religion or belief or sexual orientation, pregnancy and maternity. This includes direct discrimination, associative discrimination, perceptible discrimination, indirect discrimination, harassment, third party harassment and victimisation.

All visitors, suppliers & customers' personnel will also be treated with respect & dignity.

The company, via its Directors, has the responsibility to monitor the actions of employees, to ensure compliance with this policy and taking action to amend any non-compliance.

EQUAL OPPORTUNITIES & DIVERSITY PROCEDURES

Introduction

The Equal Opportunities & Diversity Policy establishes particular rules and procedures designed to eliminate unlawful discrimination in our employment and training practices.

Discrimination is often the result of lack of understanding or consideration for a particular group. This passive rather than active discrimination, which often manifests itself in a lack of encouragement or a reluctance to accept changes designed to move towards equal opportunities, is as unacceptable as more overt forms of discrimination. This Policy aims to combat both active and passive discrimination by providing everyone in the organisation with a framework into which will fit all employment and training practices.

The success of a business depends on people. Capitalising on what is unique about individuals and drawing on their different perspectives and experience will add value to the way we do business.

Those with staff management responsibilities throughout the organisation have a particular role to play in ensuring that the Policy is adopted within all induction and training activities and for staff posts within the company.

The Diversity of People we Employ is Reflected at all Levels Within our Workforce.

Age

Age diversity within the workforce is promoted and valued through:

- Challenging age stereotyping
- Recognising the benefits of a mixed-age workforce
- Offering employment opportunities for people over retirement age, where possible

Disability

The abilities of disabled people are recognised and valued at all levels of the organisation through:

- Focusing on what people can do rather than on what they cannot
- Challenging stereotypes about people with disabilities
- Making appropriate adjustments in the workplace to help people with disabilities achieve their full career potential, where reasonably practicable.

Gender Reassignment

Women and men are fully and properly represented and rewarded for their contribution at all levels of the organisation through:

- Challenging gender stereotypes
- Supporting employees in balancing their life at work and at home
- Supporting employees who become pregnant and taking active steps to facilitate their return to work after maternity leave
- Receiving equal reward & opportunity of advancement
- People who propose to start, or have completed a process to change his or her gender are protected against all forms of discrimination and harassment. They are not required to be under medical supervision to be protected. The employer will take positive steps to support a transsexual person and ensure they are treated with dignity and respect.
- Transsexual people will not be treated less favourably for being absent from work because they propose to undergo, or are undergoing or have undergone gender reassignment, than they would be treated if they were absent because they were ill or injured. Medical procedures for gender reassignment such as hormone treatment will not be treated as a 'lifestyle' choice.

Marriage and Civil Partnership

People are treated fairly and equally in the workplace irrespective of their marital or civil partnership status and will be protected from discrimination.

Pregnancy and Maternity

Women will be protected against discrimination of any kind on the grounds of pregnancy during the period of her pregnancy and any statutory maternity leave to which she is entitled. A pregnant employee's absence due to pregnancy-related illness or absence on maternity leave will not be discriminated against.

Race

The racial and cultural diversity of our communities is respected at all levels of the organisation through:

- Challenging racial stereotypes
- Understanding, respecting and valuing different racial groups, cultural backgrounds and perspectives.

Religion and Belief

People are treated fairly in the workplace irrespective of their religion or belief, including employees or jobseekers if they do not follow a certain religion, or have no religion at all, by recognising individuals' freedoms of belief and right to protection from intolerance and persecution. A religion must have a clear structure and belief system. Belief means any religious or philosophical belief or a lack of such belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life & behaviour. Also protected are denominations or sects within a religion or religious belief. Humanism is a protected philosophical belief, however political beliefs are not protected.

Sex

Both men and women will be treated fairly in the workplace at all times and not subjected to discrimination of any kind.

Sexual Orientation

People are treated fairly in the workplace irrespective of their sexuality through:

- Respecting different lifestyles
- Challenging negative stereotypical views

The Policy in Action Recruitment & Selection of Staff

When recruiting staff, it is the policy of the company to give equal opportunity to all and not discriminate without legal justification. The company will avoid asking health-related questions during the selection process unless there is justification for doing, eg. to ascertain if the company needs to make reasonable adjustments for the person during the selection process and to attend for interview.

Each candidate must be treated strictly on merit, ie there must be no discrimination based on age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation at, during or after the selection stage.

The company will attempt to attract applications from a diverse population.

Advertising

- All notices must carry the words "The Company Supports Equality & Diversity".
- All vacancies will be advertised internally, providing there is a suitable pool of talent & skills.
- The wording of advertisements must not exclude, or imply the exclusion or discouragement of particular groups.
- Advertisements should be designed to appeal to as wide a spectrum as possible, and be advertised as widely as possible using outlets such as community based papers, ethnic press etc where applicable. The advertisement can ask if applicants require any reasonable adjustments to the interview process to ensure everyone can give of their best during the meeting.
- This information will not be taken into account when deciding whom to employ.
- Advertisements must be cleared through the relevant manager prior to insertion into the local press.
- No reference to age must be given or the words, junior, senior etc.

Short-Listing

- All short-listing must be carried out having due regard to the job description and personnel specification required.

- More than one person must be involved in any short-listing process, whenever feasible. Short-listing must be based on the information supplied by candidates. All candidates need, therefore, to complete a standard company application form or supply a comprehensive CV.
- Each member of the short-listing panel should agree the person specification points, usually aligned with the job description and complete the proforma individually. Reasons for non-selection for interview should be recorded in the "recommendation" column on the reverse of the application form or proforma. Once it has been completed, each member of the panel or interviewer should sign and date the proforma or application form.

Interviewing

- Interview panels should comprise of at least 2 persons wherever possible. Interviewers should not normally be known to the candidate, unless there is a need for their specialist knowledge input, or, due to the status of the position, there are limited members of senior staff available.
- No health related questions about present or past health will be asked.
- Members of the interview panel must agree in advance the common areas they wish to explore with all the candidates and should allocate specific subject areas to each panel member. The criteria for selection should apply equally to each candidate and should be in accordance with the job description. This will ensure the selection of the best person for the job.

Appointment

The interview panel should discuss all candidates in relation to the person specification points and attempt to reach a unanimous decision as to whom should be appointed. The successful candidate's application form should be signed and dated by all interview panel members.

For each appointment that is made a file should be made up containing:-

- Copy of advertisement/vacancy notification.
- All original application forms or CVs
- Signed/dated, completed shortlist proforma where applicable
- Interview timetable/panel details
- Copy letters inviting candidates for interview
- Copy rejection letters

This file should then be archived for a minimum of 12 months for Equal Opportunities monitoring purposes and controlled under the company's Data Protection Policy.

Transfer, Training & Promotion Procedures

Training & promotion of employees should be related to objective criteria, should not indirectly discriminate & should be seen to be fair. The criteria and opportunities for training & promotion should be known to all employees. Those concerned with training & promotion should therefore ensure that:

- All training is linked to clear objectives, or the job description or in a written statement agreed with the Manager following training appraisal or meeting, outlining how the training is relevant to the individuals development/current position.
- Training undertaken by employees will be evaluated for quality & discriminatory practice using standard training evaluation forms.
- All employees will be made aware of training opportunities available to them by their manager or Director.
- Job transfers and upgrading will be discussed and agreed between the company and individuals before any change of position takes place. Promotion of staff will be on objective assessment of ability, motivation, work effort etc and avoid discriminatory criteria. Job vacancies will be advertised internally.
- Training & promotion opportunities should be open to all age groups.

Pay & Benefits

All pay & benefits will relate to service criteria over 5 years of employment if this fulfils a business need. The three kinds of equal work are:

- A woman doing work that is broadly similar to the work carried out by a man in the same employment (a "comparator") will be doing "like work".
- Although their work is different, a job evaluation study shows that a man's and a woman's jobs are rated as equal. This work is called "rated as equivalent".
- When the man's and woman's jobs are different but are equal in value in terms of demands or skills that are needed. This is "work of equal value".

Where required, a job evaluation study will be carried out to justify any different salary scales and adjust if necessary. The company will treat men and women fairly and equally and not discriminate between the sex of the workers. Benefits will be related to objective criteria such as length of service, experience of the employee or reward for loyalty or to maintain or increase motivation of the employee. Evidence for fulfilling a business need will be based on monitoring, staff surveys, individual or group discussions with staff and will take into account that length of service is very often more applicable to men. Similarly, if a man is being paid less than a woman for equal work, equal pay also refers to him.

Bullying & Harassment

It is in everyone's interests for the environment in which we work to be harmonious & respectful. Although we would like to think that this is always the case, this policy recognises that inappropriate behaviour, which may include harassment, can and does take place. This policy aims to ensure that if inappropriate behaviour does occur in the workplace it is dealt with in a serious, sensitive and confidential manner so that the matter can be resolved as quickly as possible for all concerned.

We are committed to tackling incidents of inappropriate behaviour swiftly and decisively. A strong stand is needed on this issue to enable people of all backgrounds to have dignity at work, and to enable them to progress in the organisation & fully contribute to our success.

Bullying

Bullying is regarded as any behaviour, occasional or persistent, by anyone, that intimidates or oppresses another person, possibly through misuse of authority or power. It can be subtle in nature and is intended to hurt.

Examples of bullying may include:

- Derogatory remarks
- Insensitive jokes or pranks
- Insulting or aggressive behaviour
- Ignoring or excluding an individual
- Setting unrealistic deadlines
- Public criticism and/or insults
- Substituting responsible tasks with menial or trivial ones
- Withholding necessary information
- Constantly undervaluing effort

Identifying Harassment

It is important to remember that harassment:

- Depends on the view of the individual on the receiving end of another person's behaviour.
- Does not depend on the severity of the behaviour – a joke or throw-away comment could be perceived as harassment by anyone who hears it.
- Can include behaviour that you hear or see, even if it's not directed at you and has nothing to do with you.

Sexual Harassment

Examples:

- Insensitive jokes or pranks
- Lewd comments about appearance
- Unnecessary body contact
- Displays of sexually offensive material, eg pin-ups
- Requests for sexual favours
- Speculation about a person's private life and sexual activities

- Threatened or actual sexual violence
- Threat of dismissal, loss of promotion etc for refusal of sexual favours

Sexual Orientation Harassment

Examples:

- Homophobic remarks or unwanted banter about sexual orientation
- Jokes about gay, lesbian or bi-sexual people generally
- Offensive remarks (whether spoken or in writing)
- Offensive terminology or slang
- Deliberate isolation or non co-operation of someone at work
- Derogatory gestures

Racial Harassment

Examples:

- Insensitive jokes related to race
- Pranks
- Deliberate exclusion from conversations
- Abusive, threatening or insulting words and behaviour
- Displaying abusive writing and pictures

Religion and Belief Harassment

Examples:

- Actions motivated by religious differences
- Jokes, banter or derogatory remarks
- Detrimental treatment due to religion or belief
- The wearing of clothing, jewellery & displaying of slogans which cause offence

Disability Harassment

Examples:

- Pranks played against a disabled employee
Jokes or banter about disability

Mimicking

Deliberate isolation at work due to disability or serious medical condition

Age Harassment

Examples:

- Jokes, banter or remarks about older people generally which are demeaning or derogatory
- Ageist remarks made to or about an employee
- Referring to someone using ageist terminology, for example “daft old bat”, “silly old codger” or “young whippersnapper”
- Calling someone a nickname with an age-bias, for example “Old Jim”
- Ignoring someone, or refusing to co-operate with him/her, on the grounds that he or she is perceived “too young” to contribute anything useful
- Treating a young colleague’s ideas or suggestions as inferior just because of his/her youth
- Teasing directed at an employee on account of the fact that he or she has a much older or much younger partner
- Cracking jokes or making demeaning remarks suggesting that an older person’s physical or mental faculties may be declining on account of his/her age
- Pranks played on someone for an age-related reason

Managers and staff have the responsibility to investigate and take action necessary to eliminate bullying & harassment of all kinds. However, in doing so, they will need to establish whether the complainant wishes the action to be formal or informal due to likely high exposure/effect on personal relationships. Formal means using standard grievance & disciplinary procedures. Informal means private meetings between parties whereby the outcome is strictly confidential. If there are any cases of victimisation, harassment or discrimination this will be looked upon as a disciplinary offence.

Discrimination by Association or Perception

The company will not discriminate against someone because they are associated with a person who has one of the “protected characteristics”. The company will ensure it’s staff are properly trained to avoid discrimination in the workplace and avoid unintended offence by unthinking “banter”.

Third Party Harassment

Under The Equality Act 2010, the company has the responsibility to protect employees from third party harassment which covers age, disability, gender reassignment, race, religion or belief and sexual orientation, (eg from suppliers, customers, visitors etc). If any employee is subjected to harassment by any third party on at least two occasions, they must make their manager or the appropriate person in the company aware of this as soon as possible using the complaints procedure detailed below. The company will take all reasonable steps to ensure the third party is made aware that their behaviour is unacceptable and must not be repeated or they may be subject to a ban by the company. The company will keep the employee who is claiming harassment informed of the actions taken by the company.

Complaints Procedure

All complaints of discrimination or harassment will be treated seriously and will be dealt with promptly, efficiently and, so far as is possible, in confidence. The main aim of this procedure is to resolve complaints of discrimination or harassment so that the discriminatory treatment is remedied or the harassment stopped.

Any employee may use this procedure if they believe he or she has:

been treated unfavourably in contravention of the organisation's equal opportunities policy and the grounds of sex, transsexual status, sexual orientation, marital or civil partnership status, race, religion, belief, political opinion, age or disability.

- Been subjected to any form of harassment or bullying at work.
- Witnessed the harassment of a colleague.
- Been subject to harassment from a third party.

Employees who, in good faith, raise a genuine complaint under this procedure will not be subjected to any unfavourable treatment or victimisation as a result of making a complaint.

The Procedure

Any employee who believes that they have been the victim of discriminatory treatment or harassment, or who has witnessed discrimination or harassment may choose to take informal or formal action.

Informal Action

Where possible, the employee should talk directly and informally to the person who they believe has discriminated against them or harassed them and explain clearly their objection to the other employee's actions or conduct. In the case of harassment, the employee should explain clearly what aspect of their colleague's behaviour is unacceptable, or is causing offence, and request that it should stop. It may be that the person whose conduct is causing offence is genuinely unaware that their behaviour is unwelcome or objectionable.

If the employee feels unable to approach the person whose actions or conduct is causing offence, if they have already done so but to no avail, or if the complaint is one of very serious harassment, they may elect to raise a formal complaint. Alternatively, the complaint can be raised informally with an HR officer or senior manager, in which case the nominated person will try to assist the employee to find an informal solution to the problem.

Formal Action

The employee may raise a complaint, in writing, with their departmental manager or director.

The complaint must identify the person who is alleged to have perpetrated discriminatory treatment or harassment, and give specific examples of the actions or conduct that the employee believes constitute discrimination or harassment. Specific incidents should be highlighted, with times and dates and the names of any witnesses if possible.

The person responsible for dealing with the complaint should act immediately to:

- Establish the legal position.

- Investigate the complaint (see below).
- Take steps to conciliate if, after discussion, both parties agree this is an acceptable course of action, or
- Take formal action if this is appropriate.
- In the event of serious allegations of harassment, the manager should consider whether to suspend the alleged perpetrator of the harassment in order to prevent any further contact between the parties until the matter can be fully dealt with (suspension should, however, be done in a way that does not penalise the employee accused of discrimination or harassment, or prejudge the allegations).

Investigation

The organisation undertakes to investigate all complaints of discrimination & harassment objectively and confidentially. The responsible manager's investigation into the complaint will be handled with due respect for the rights of both the complainant and the alleged perpetrator. Both parties will be separately interviewed as soon as possible and granted the right, if they wish, to be accompanied by a colleague or trade union representative at their interview.

In advance of the interview with the alleged perpetrator of the discrimination/harassment, the person must be informed in writing of the exact nature of the complaint against them. At the interview itself, the alleged perpetrator must be given a full and fair opportunity to state their side of events, and explain any conduct that forms the basis of the employee's complaint against them.

Investigation of a Third Party

A manager or director will interview person(s) harassed and take/request statement(s). Statement(s) will also be taken from any witnesses to the event.

The Outcome of the Investigation

If, following investigation, it is apparent that the complaint is well-founded, prompt action will be taken to remedy the discrimination or stop the harassment and prevent its recurrence.

The outcome of the investigation into the employee's allegations of discrimination or harassment may be (depending on what is established during the investigation and the interviews), that:

- The complaint is well-founded & the alleged perpetrator of the discrimination or harassment is disciplined or dismissed (in line with the organisation's disciplinary procedure)
- The allegations made by the employee are not viewed as discrimination or harassment & no further action is taken
- The employee's complaint is found to be false or malicious, in which case disciplinary action may be taken against them
- Standards for future conduct are set, which could involve training
- Third party harassment warrants formal/informal action.

The organisation regards all forms of harassment & bullying as gross misconduct, and any employee who is found to have been guilty of such behaviour will be liable to disciplinary action up to and including summary dismissal. Disciplinary action will also be taken against any employee who is found to have made a deliberately false or malicious complaint of discrimination, harassment or bullying.

Formal/Informal Action Against Third Party

Employees must recognise that action against third parties may not always be practical or achievable, ie abusive telephone call from an unknown person/source. However, all instances should be reported to management who will consider the practicality of changing work procedures.

- Where the alleged harasser is known, the following action would be considered by the company.
- Informal discussion with the alleged harasser with a view to prevent any further harassment.
- Formal action, which may include letter of complaint, removal of client services, cancellation of orders, ban person(s) from company premises.
- Reporting very serious issues to the police.

Note: The above actions must not be taken by any employee without prior permission of a director.

Appeals

If the employee who has made the complaint is not satisfied with the outcome, they may appeal in writing to a senior manager or director, setting out the reasons for their dissatisfaction. The appeal must be submitted within two weeks of the receipt of the written report from the manager who handled the complaint.

The senior manager or director responsible for the appeal will convene a hearing with the employee to establish the grounds for their dissatisfaction & explore possible resolutions, having notified them of their right to be accompanied by a colleague or trade union representative at the hearing. The hearing will normally be held within two weeks of receipt of the employee's written appeal.

Following the appeal hearing, the senior manager or director will reconvene the hearing with the employee within a further two weeks, describing any action that they propose to take and the time-scale, or informing them that the appeal has not been upheld and no further action will be taken.

If it is not possible to respond within the time periods stated above, the employee will be given an explanation as to the reasons, and asked to agree a reasonable extension of the time-scale.

This will be the final stage of the procedure.

Records

Records will be kept detailing the nature of the allegation or discrimination or harassment, the organisation's response, any actions taken, the reasons for them and the outcome. Details of these will remain on file by the company who will ensure the records are held in accordance with the Data Protection Act 1998. The management will also be responsible for making arrangements for statistical data to be released about the procedure and its usage for the purposes of monitoring.

Monitoring and Evaluation

The company recognises that without monitoring, the organisation will have no way of knowing whether or not their policy has been effective.

- Records will be kept of all job applicants, promotions & training. This will enable a check to be carried out on the Equal Opportunities & Diversity Policy to ensure it is working properly.

- The above records should reveal any bias or possible discrimination in the selection and allocation processes for potential employees with regard to employment, promotion & training. Any problem areas revealed will need to be dealt with by the appropriate staff.
- Records of complaints will be analysed and appropriate action taken or referred to management meetings. Equal Opportunities statistics will also be compiled where appropriate to identify any non-compliance with this policy.
- Equal Opportunities & Diversity is an agenda item at Management meetings in order that the progress of the policy may be evaluated and where necessary re-drafted or amended in order to progress the implementation of the policy.

Training of Employees

The company is committed to training all employees on equality and diversity to include job roles & responsibilities, legal issues & steps to be taken to eliminate and promote equality at all times.