

Group policies – Workplace policies

Our equal opportunities policy

We are committed to promoting a working environment that is free from discrimination, harassment and victimisation. Our policy is to provide equal employment opportunities to all employees regardless of personal status and to prohibit all forms of discrimination. We base our employment decisions on merit, qualifications and abilities. We treat any breach of this policy as a disciplinary matter.

Equal opportunity in employment

We prohibit any discrimination on the grounds of: gender, marital status, sexual orientation, pregnancy, race, colour, ethnic origin, nationality, religion or belief, disability, age, political opinion, trade union membership or any other legally protected status or form of harassment on any grounds. Furthermore, we do not discriminate on the grounds of part-time status or 'spent' criminal convictions.

Treating an employee less favourably than other employees in the same circumstances on one of these grounds amounts to direct discrimination. In addition, employees should be aware that unlawful indirect discrimination can occur when the unjustified application of a provision, criterion or practice disadvantages an individual or group because they cannot comply with it.

Harassment and victimisation are forms of unlawful discrimination and will not be tolerated:

- Harassment is defined as **unwanted conduct** with the purpose or effect of either violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person
- Victimisation is when an individual is subjected to **unwanted and humiliating behaviour** because he or she has made allegations of harassment or bullying or has acted as a witness in an investigation or complaint.

This policy applies to all aspects of our working practices, including:

- Recruitment and selection of employees
- Terms and conditions of employment
- Promotion
- Training and development
- Post employment practices, such as the provision of employment references
- The general application of all policies.

As such, the provisions of this policy apply to job applicants, current employees and former employees.

Flexible working

We aim to facilitate flexible working arrangements, where practicable and in the interests of both parties, to support employees with care responsibilities outside work. Our flexible working policy outlines alternative working arrangements, including the statutory right of working parents to request flexible working. This is available to employees on the intranet and from their HR department.

Disability discrimination

We aim to ensure that disabled employees and job applicants are treated with respect and dignity. We are committed to taking all reasonable steps in accommodating the needs of disabled people to enable them to be employed and to continue in employment where they are able to perform the functions of the job.

We will make every effort to make reasonable adjustments to the workplace and working arrangements to enable the recruitment of a disabled person or the continued employment of a current employee who becomes disabled.

In certain circumstances it may not be possible to make reasonable adjustments, such as when the building's physical features cannot be changed. If we cannot provide a safe working environment for a disabled person, it may not be possible to recruit a disabled applicant or to continue a disabled individual's employment.

Examples of the types of adjustments that may be considered include:

- Providing specialist equipment and training
- Job redesign, where there is sufficient scope within the role and business area
- Change to working pattern
- Redeployment.

All decisions in relation to the employment of an individual who has a disability will be based on the individual's ability to do the job and a consideration of reasonable adjustments. We will seek medical or occupational health advice to enable appropriate decisions to be made and consult the employee in the process.

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Our equal opportunities policy cont.

Treatment of discrimination

We view any breach of this policy or any other form of discriminatory action seriously. Any employee who breaches the principles of this policy will be liable to disciplinary action up to and including dismissal. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

Employees with questions or concerns about any type of discrimination in the workplace should raise them with their line manager, or line manager's manager where appropriate, or their HR department.

An employee who wishes to make a formal complaint about discriminatory conduct should use the grievance procedure.

Where an employee feels that they are the subject of discrimination as a result of bullying, harassment or victimisation, they should refer to the bullying and harassment policy for guidance.

Where a concern about discrimination is raised, all discussions will be treated in the strictest confidence, although it may be necessary to disclose information to others involved in the investigation.

Monitoring

The HR department is responsible for monitoring the effectiveness of the application of this policy. Information used for monitoring may relate to an individual's gender, ethnic origin, grade, remuneration or any other criteria required. All data is processed in accordance with the Group's data protection policy.

Contact

The HR department is responsible for ensuring that this policy is adequately implemented, monitored and maintained.