

> EQUAL OPPORTUNITIES POLICY

>BACKGROUND

- 1.1 The Company is an equal opportunity employer. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination on the grounds of colour, race, nationality, ethnic or national origin, sex, gender (including gender reassignment), sexual orientation, age, marital status, religious or other similar philosophical belief and disability.
- 1.2 We aim to ensure that our employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria.
- 1.3 Xfor Management is committed to ensuring diversity is embedded in the organisation by valuing peoples differences, ensuring fair treatment of all through the consistent application of this guidance and ensuring equality of opportunity for all. We have adopted this policy and guidance as a means of helping to achieve these aims. This will be reviewed regularly and communicated to all employees and new starters.
- 1.4 This Policy and guide is based on the advice given by the Equal Opportunities Commission and the Commission for Racial Equality. We have applied their recommendations to our business where practicable to do so and endeavour to continuously improve any element which may be considered ineffective.

>MANAGEMENT

- 2.1 The Company supports this equal opportunities policy with strong commitment and encourages all employees to seriously consider how all aspects outlined herein affect their daily routine and interaction with colleagues, clients, consultants and suppliers. We strive to ensure that any form of discrimination does not play a part of any of our processes, decisions, training or development. We consistently appraise this by challenging our processes and as such provide:
 - 2.1.1 Clear communication, management and direction on any issue of discrimination.
 - 2.1.2 Escalation routes for complaints of any kind.
 - 2.1.3 Disciplinary courses of action for any individual found acting discriminatorily.
 - 2.1.4 Financial support to any training needs clearly defined or realised which may assist us in achieving our objectives in this matter and supporting our client's achieving theirs.
 - 2.1.5 Support from our colleagues and the Management Team.

>POLICY & GUIDANCE

- 3.1 This Policy has been designed to offer guidance to our employees and management on what equal opportunities means to Xfor Management, the laws which we are responsible to operate within, the management of our processes and people and offer guidance on examples of what discrimination is.
- 3.2 RECRUITMENT – when recruiting it is essential to:
 - 3.2.1 Be clear what the job entails and what the key duties are;
 - 3.2.2 Ask applicants for information that will tell us they can do the job;
 - 3.2.3 Don't ask questions unrelated to the job – get the facts and be open-minded;
 - 3.2.4 Assess people on their merits;
 - 3.2.5 Don't make assumptions about who won't 'fit in';



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- 3.2.6 Advertise a vacancy openly, as this will help us attract better applicants – don't simply rely on the friends and family of current employees;
- 3.2.7 Where reasonable to do so, adapt our methods of recruitment so that disabled people can apply and attend for interview (seek further guidance from your Line Manager);
- 3.2.8 If training is required to fulfil our responsibilities in this area then the necessary action must be taken;
- 3.2.9 When using a recruitment agency, make sure we do not ask them to act unlawfully;
- 3.2.10 When we are recruiting directly, keep track of what is happening; and,
- 3.2.11 Ensure starting pay is set fairly and equitably and verify the successful applicant's former pay level with their former employer.
- 3.2.12 When advertising or consulting with agencies or through job centres, ensure mention is made of our equal opportunities approach to selection,

3.3 RETENTION

- 3.3.1 We endeavour to keep open channels of communication with all our staff – it makes things easier for everyone.
- 3.3.2 We will make sure that opportunities for promotion and training are made known to all staff and are available on a fair and equal basis.
- 3.3.3 Always make new recruits feel welcome by showing them around the workplace, introducing them to their colleagues, and familiarising them with 'house rules'.

4 HARASSMENT/BULLYING

- 3.4.1 A firm stance is taken by the company as we consider that it will benefit all of our staff and help our business to run smoothly.
- 3.4.2 We make it clear to everyone that harassment and bullying will not be tolerated – and should be reported to your line manager (or the HR team if appropriate) for escalation. A high level of confidentiality is assured in this process.
- 3.4.3 As a Manager or a confidant, don't be tempted to blame the person being harassed or bullied, and don't discipline or sack them; openly discuss the situation with both parties and deal with the person causing the problem.

5 DISCIPLINE/GRIEVANCES

- 3.5.1 Any act of discrimination will have serious affects and is not treated lightly. We have procedures for handling discipline and grievances. These apply to all staff. These are designed to help us to resolve problems quickly and before they become too serious.
- 3.5.2 We commit to applying disciplinary action fairly and consistently regardless of race, sex, disability, sexual orientation, religion, belief, or age.



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.6 MONITORING/KNOWING OUR STAFF

- 3.6.1 We strive to keep basic information on our staff and consider that it can improve our business effectiveness and will also be useful if a complaint is ever made. We maintain a high-level approach on keeping information such as:
- 3.6.2 how our staff group is made up – for example by sex, ethnic group, those with a disability. This is sensitive information and as such we treat it with respect by telling people why and how the information will be used;
- 3.6.3 job applicants and appointments;
- 3.6.4 sick leave/absences and reasons;
- 3.6.5 disciplinary action/grievances;
- 3.6.6 this information is personal and should be kept confidential;
- 3.6.7 rates of pay; and,
- 3.6.8 training received.

.7 FLEXIBILITY/REASONABLE ADJUSTMENTS

- 3.7.1 We endeavour to make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled customers to access our services. This includes the lift access to all floors of our purpose built offices and ground floor access to the majority of meeting rooms. Please consider this prior to arranging any meetings or interviews.
- 3.7.2 Similarly, where reasonable, we are willing to review and change working practices or arrangements that put disabled employees or job applicants at a substantial disadvantage.
- 3.7.3 We must remember that offering a flexible approach to working arrangements can have advantages for our business and our staff. We are required by law to consider applications for flexible working from employees with young children and endeavour to consider such requests carefully and objectively and, unless it would cause real difficulties for our business or the employee, we accommodate them. This could mean offering flexible hours, or time off for family or religious needs. We also allow eligible employees time off for parental or adoption leave, or to deal with an emergency involving their child, partner or anyone who relies on them for care. Flexibility also means accommodating religious or cultural dress codes.

.8 MATERNITY/PATERNITY LAW

- 3.8.1 When an employee becomes pregnant we allow her paid time off for antenatal care;
- 3.8.2 provide additional health and safety protection for her and her child during her pregnancy, while she is a new mother, or as long as she is breastfeeding;
- 3.8.3 allow her to return to her job after a period of maternity leave.
- 3.8.4 We do not dismiss her because she is pregnant or penalise her for any pregnancy-related sickness absence, or for any reason connected with pregnancy or maternity leave. This applies to our employee no matter how short a time she has been working for us and regardless of how few hours she works. Fathers who have been working for us for at least a year are entitled to take two weeks paid paternity leave when their child is born. We can reclaim the cost of statutory paternity pay.



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- .9 EQUAL PAY
- 3.9.1 We regularly check our pay arrangements to make sure that men and women are getting equal pay. We define this as providing the same and conditions for men and women doing work that is the same, or broadly similar; has been rated as equivalent under a job evaluation scheme; or, is of equal value in terms of the effort, skills, knowledge and responsibility required.
- 3.9.2 Employees should know how their pay is made up. It should be clear, for example, how any bonuses can be earned, and how they are calculated. This applies to both full-time and part-time employees. The same work should be paid the same hourly rate, whether it is done by men or women, and whether it is done full-time or part-time.
- 3.9.3 If anyone is in doubt please review this at your regular appraisals where advice can be given.
- .10 LAWS ON EQUALITY
- 3.10.1 **Equal Pay Act 1970:** The Equal Pay Act 1970 gives an individual a right to the same contractual pay and benefits as a person of the opposite sex in the employment, where the man and the woman are doing the same work, as equivalent work, or work of equal value.
- 3.10.2 **Sex Discrimination Act 1975:** This makes discrimination on the grounds of sex or marriage unlawful. It is not unlawful to discriminate against someone they are not married. Victimisation, because someone has tried to exercise his or her rights under the Sex Discrimination Act or the Equal Pay Act, is also unlawful. The Sex Discrimination Act applies to women, men and children of all ages.
- 3.10.3 **Race Relations Act 1976:** This makes discrimination on the grounds of race, colour, nationality (including citizenship), or ethnic or national origin unlawful. The law covers people from all racial groups, including white people. In 2000, the Act was amended so that it now includes public functions not previously covered, even if those functions are carried out by a private business. It also places a general duty on listed public authorities to promote race equality. A public authority remains responsible for meeting this duty when it contracts a private business to carry out any of its functions. Private contractors will need to bear this in mind.
- .4 **Disability Discrimination Act 1995:** This deals with discrimination against disabled people – that is, when someone treats a disabled person less favourably than someone else, without justification, for a reason related to their disability. Discrimination also occurs if, without justification, a ‘reasonable adjustment’ is not made. The Act applies to all those who provide goods, facilities and services to the public. From October 2004, service providers will have to consider changing physical features that make it unreasonably difficult for disabled people to use their services. The employment provisions of the Act applied originally to employers with 15 or more employees, but from October 2004 they will also apply to most employers with fewer than 15 employees.
- .5 **Employment Equality (Sexual Orientation) Regulations 2003:** This outlaws discrimination in employment and training on the grounds of sexual orientation. It covers people whether they are gay, lesbian, bisexual or heterosexual.
- 3.10.6 **Employment Equality (Religion or Belief) Regulations 2003:** This outlaws discrimination in employment and training on the grounds of religion or philosophical belief.

