

EQUAL OPPORTUNITIES POLICY

EWG HR EQOPP Issue 5

Paper copies are uncontrolled. This copy is only valid at the time of printing.

EQUAL OPPORTUNITIES POLICY

Amendment History

Issue	Date	Nature of Change	Author	Approval
Issue 1	19 October 2010	Reformatted and reworded policy	HR Mgr	Mngment Board – Octr 2010
Issue 2	15 February 2012	Updated to take account of changes to Equality Act 2012	HR Mgr	Mngment Board – Feb 2012
Issue 3	December 2014	Review – no changes necessary	HR Mgr	Mngment Board – Dec 2014
Issue 4	December 2015	Annual review – no changes	HR Mgr	Mngment Board – Dec 2015
Issue 5	January 2017	Annual review – no changes	HR Mgr	Mngment Board – Jan 2017

Purpose

The purpose of this Policy is to ensure that mechanisms are in place to provide equal opportunities in employment and to avoiding unlawful discrimination in employment and that these mechanisms are applied consistently across the EWG businesses.

Scope

This policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay, to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment, including redundancy.

Responsibilities

The functional responsibility for the development, review and maintenance of this Policy rests with the Human Resources Manager, who is also responsible for retaining records of the amendments made to this Policy.

The Human Resources Manager is responsible for ensuring that this Policy is properly and consistently applied across all EWG businesses and for providing assistance and guidance to employees as appropriate.

The Management Board is responsible for approving amendments to this Policy.

EQUAL OPPORTUNITIES POLICY

The Group is committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment.

It is unlawful to discriminate directly or indirectly in recruitment or employment on grounds of the following protected characteristics:- age, disability, gender reassignment, marriage and civil partnership, race, colour, nationality, ethnic or national origin, religion or belief, sex and sexual orientation.

Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where an employer discriminates against an employee because of a protected characteristic, whether or not the employee possesses that characteristic. It is also unlawful to discriminate against employees because of their connection with someone else who possesses a protected characteristic, or because they are mistakenly perceived to possess a protected characteristic. This is known as discrimination by association or perception. Unlike the other forms of discrimination, direct discrimination on the grounds of age can be justified.

Indirect discrimination is where everyone is treated in the same way but the treatment adversely affects one group more than another and cannot be objectively justified, e.g. requiring everyone to work full time will normally adversely affect more women than men and will be unlawful indirect sex discrimination unless there is a good reason, unrelated to sex, as to why the particular job has to be done on a full-time basis.

It is unlawful to 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.

This policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay, to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment, including redundancy.

Recruitment and selection

The Company aims to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with prior approval of Human Resources, for example:

- questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments);
- questions to establish if an applicant is fit to attend an assessment or any reasonable adjustment, that may be needed at interview or assessment;
- positive action to recruit disabled persons; or
- equal opportunities monitoring (which will not form part of the decision making process).

EQUAL OPPORTUNITIES POLICY

The Company takes steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups underrepresented in our organisation. Where appropriate, use may be made of lawful exemptions to recruit suitably-qualified people to cater for the special needs of particular groups. Vacancy advertisements shall include an appropriate short statement on our Equal Opportunities Policy and a copy of this policy shall be sent to those who enquire about vacancies.

To ensure that this policy is operating effectively with respect to recruitment and selection and the other areas covered by this policy, and to identify those sections of the local community which may be under-represented in employment, the Company monitor applicants' racial origins, gender, disability, sexual orientation and religion and age as part of the recruitment procedure. The Company also maintain records of this data solely for the purposes stated in this policy. Ongoing monitoring and regular analysis of the data obtained provide the basis for taking appropriate steps to eliminate unlawful direct and indirect discrimination and implement this policy.

Employee training and promotion and conditions of service

Employee training needs will be identified through regular appraisals. All employees will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

The composition and movement of employees at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken 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 underrepresented groups. Our conditions of service, benefits and facilities are reviewed regularly 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.

Termination of employment

The Company will monitor redundancy criteria and procedures to ensure that they are fair and objective and are not directly or indirectly discriminatory.

The Company will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Disability discrimination

If you are disabled, or become disabled, you are encouraged to tell the Company about any condition. This is to enable the Company to support you as much as possible. You may also wish to contact your Line Manager or the Human Resources Department to discuss any reasonable adjustments that would help you overcome or minimise this difficulty. Your Line Manager or the Human Resources Department may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job. Nevertheless, there may be circumstances where it will not be reasonable for the Company to accommodate suggested adjustments and the Company will ensure that you are provided with information as to the basis of the Company's decision not to make the suggested adjustments and will try to find an alternative solution where possible.

EQUAL OPPORTUNITIES POLICY

The Company will monitor the physical features of the premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other employees. Where reasonable, the Company will take steps to improve access for disabled employees and service users.

Breaches of the policy

If you believe that you may have been discriminated against, you are encouraged to raise the matter through the Company's Grievance Procedure. If you believe that you may have been subject to harassment, you are encouraged to raise the matter through the Company's Anti-harassment Policy. If you are uncertain which policy applies or need advice on how to proceed you should speak to Human Resources.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under the Company's Disciplinary Procedure.

Any employee who is found to have committed acts of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The Company always take a strict approach to serious breaches of this policy.



GROUP MANAGING DIRECTOR