



Equality, Inclusion & Diversity Policy

Nov | 2019

Responsible Committee: Executive Leadership Team

Date Effective: November 2019

Supersedes: Equal Opportunities Policy November 2018

Next Review: November 2020

EQUALITY, INCLUSION & DIVERSITY POLICY

This policy covers all of the SELDOC Group of Companies – since known as SELDOC or the Company.

SELDOC is an equal opportunity employer. We are committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. We have adopted this policy as a means of helping to achieve these aims.

The Company does not discriminate against staff on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age (“protected characteristics”).

The principles of non-discrimination and equality, inclusion and diversity also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status. Your attention is drawn to the Company Harassment policy.

This policy does not form part of any employee's contract of employment and may be amended at any time.

Who is covered by the policy?

This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, volunteers, casual workers and agency staff (collectively referred to as staff in this policy).

Who is responsible for this policy?

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equality, inclusion and diversity. Managers will be given appropriate training on equality, inclusion and diversity awareness and equal opportunities recruitment and selection best practice. The CEO has overall responsibility for equality, inclusion and diversity training.

If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact your Manager to request training or further information.

Scope and purpose of the policy

This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

What is discrimination?

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Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics. Direct discrimination may occur even when unintentional. It may also, in some cases, occur by association – i.e. where a person is put at a disadvantage due to a characteristic of another person. Ethical vegans are protected from discrimination under equality laws as ruled by a Judge on 3rd January 2020.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same Protected Characteristic at a particular disadvantage.

For example, a requirement for GCSE English as a selection criterion. This would have a disparately adverse impact on people educated overseas and may not be justified if all that is needed is to demonstrate a reasonable level of literacy.

Harassment related to any of the Protected Characteristics is also prohibited. Harassment is dealt with further in our Harassment Policy.

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

Recruitment and Selection

The Company aims to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. The Company 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.

Shortlisting of applicants should be done by more than one person wherever possible.

Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. They should include an appropriate short policy statement on equal opportunities and a copy of this policy shall be sent on request to those who enquire about vacancies.

The Company takes steps to ensure that any vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation. Where appropriate, the Director may approve the use of lawful exemptions to recruit someone with a particular protected characteristic - for example, where the job can only be done by a woman. The advertisement should specify the exemption that applies.

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 the Directors approval. For example:

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- 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 adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the decision-making process).

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of the appropriate Company representative (who should first consider whether such matters are relevant and may lawfully be taken into account).

The Company are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from you Manager or the UK Border Agency.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, the Company monitors applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure.

Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

Staff Training and Promotion and Conditions of Service

Staff training needs will be identified through regular staff appraisals. All staff 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.

Workforce composition and promotions 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 unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

The Company conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff that should have access to them and that there are no unlawful obstacles to accessing them.

Termination of Employment

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

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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, the Company will encourage you to tell the Company about your condition so that the Company can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact a Director to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Director may wish to consult with you and your medical adviser(s) about possible adjustments. The Company will consider the matter carefully and try to accommodate your needs within reason. If the Company considers a particular adjustment would not be reasonable the Company will explain our reasons and try to find an alternative solution where possible.

The Company will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff.

Where reasonable, we will take steps to improve access for disabled staff and service users.

Fixed-Term Employees and Agency Workers

We monitor our use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

Part Time Work

The Company monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. The Company will ensure requests to alter working hours are dealt with appropriately under our Flexible Working Policy.

Breaches of this Policy

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

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff 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 Disciplinary Procedure.

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Any member of staff who is found to have committed an act 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 takes a strict approach to serious breaches of this policy.

Monitoring and Review of this Policy

This policy is reviewed on a regular basis. Recommendations for change should be reported to your Manager.

The Company will continue to review the effectiveness of this policy to ensure it is achieving its objectives. As part of this process the Company monitors the composition of job applicants and the benefits and career progression of its staff.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting your Manager.