

## **EQUAL OPPORTUNITIES POLICY**

### **POLICY STATEMENT**

Integral UK Ltd recognises that discrimination, victimisation or bullying are unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment, employment or opportunity on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the **protected characteristics** as defined by the Equality Act 2010).

This policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination and also aims to provide a service that does not discriminate against its clients and customers in the means by which they can access the services supplied by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.

We oppose all forms of unlawful and unfair discrimination, victimisation or bullying. To that end the purpose of this policy is to provide equality and fairness for all in our employment and should be used in conjunction with the Dignity at Work Policy (PER075).

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Our staff will not discriminate directly or indirectly, or harass customers or clients because of a protected characteristic in the provision of the Company's goods and services.

This policy does not confer any contractual rights on individual employees. The company reserves the right to alter any of its terms at any time although you will be notified in writing of any changes.

### **OUR COMMITMENT**

- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- To promote equality in the workplace which we believe is good management practice and makes sound business sense.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by Senior Management and will be reviewed on a regular basis.
- The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to any protected characteristic.
- The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment based upon any protected characteristic.

- The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers and will also take appropriate action against third parties who are found to have committed an act of improper or unlawful harassment against its employees.
- This Policy also covers harassment outside working hours where, for example, the Company has been brought into disrepute, the conduct creates a hostile or intimidating environment during working hours and/or the conduct has an adverse effect on a person's ability to perform their job properly.

### **RESPONSIBILITIES OF MANAGEMENT**

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Board of Directors. Directors / Line Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination, victimisation or bullying. Each Line Manager will ensure that:

- the policy is applied throughout the recruitment process
- all their staff are aware of the policy and the arrangements, and the reasons for the policy
- employees are made aware of the provisions of this policy and of their personal responsibilities during induction
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible
- proper records are maintained

The HR Director will be responsible for monitoring the operation of the policy in respect of employees.

### **RESPONSIBILITIES OF ALL EMPLOYEES**

Responsibility for ensuring that there is no unlawful discrimination rests with all employees and the attitudes of our employees are crucial to the successful operation of fair employment practices.

All employees have a duty to co-operate with the Company to ensure that its policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the Company's Discipline at Work Procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation.

All employees must not discriminate in their day to day activities or induce others to do so, must not victimise, harass or intimidate other employees or groups who have, or are perceived to have one of the protected characteristics.

All employees must ensure no individual is discriminated against, harassed or bullied because of their association with another individual who has a protected characteristic.

You should draw the attention of your Line Manager to suspected acts or discriminatory practices or suspected cases of harassment. You must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's Discipline at Work Procedure (PER070).

Serious breaches of this equal opportunities and dignity at work policies will be treated as potential gross misconduct and could lead to an employee's dismissal. Employees should also bear in mind that they can also be held personally liable for any act of unlawful discrimination. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

### **THIRD PARTIES**

Third-party harassment occurs where a Company employee is harassed by third parties such as clients or customers. Integral will not tolerate such actions against its employees and the employee concerned should inform their Line Manager at once if this occurs. Integral will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

### **TYPES OF DISCRIMINATION**

#### **Direct Discrimination**

Direct discrimination occurs when someone is treated less favourably than another person because they have or are thought to have a protected characteristic or because they associate with someone who has a protected characteristic.

#### **Indirect Discrimination**

Indirect discrimination occurs as a result of a provision, criterion or practice (PCP) that applies to everyone but which particularly disadvantages people who share a protected characteristic. This does not normally apply to pregnancy or maternity.

#### **Discrimination by Association**

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic. This applies to race, religion or belief, sexual orientation, age, disability, gender reassignment and sex.

#### **Perception Discrimination**

This is direct discrimination against someone because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. This applies to race, religion or belief, sexual orientation, age, disability, gender reassignment and sex.

### **MONITORING**

The Company will regularly monitor personal data which is collected via the Company's Equal Opportunities Questionnaire. Records held and any analysis will be compliant with data protection legislation.

The data involves the routine collection of information on employees by gender, marital status, ethnic origin, sexual orientation, religion / beliefs. Information regarding the number of staff who declare themselves as disabled will also be maintained.

The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

If monitoring shows that the Company, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the Company, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, Company policies and practices as well as consideration of taking legal Positive Action.

### **TRAINING**

Training will be provided for Line Managers on this policy and the associated arrangements, including all those involved with recruitment & selection.

All employees will be advised of their obligations in respect of this policy at induction.

### **ADVERTISING**

The Company will advertise all vacancies as an Equal Opportunity Employer and welcome applications from all sections of the community.

### **GRIEVANCES/DISCIPLINE/COMPLAINTS**

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance Procedures (PER071).

Discrimination, victimisation or bullying will be treated as a disciplinary offence and will be dealt with under the Company Disciplinary at Work Procedure (PER070). Such behaviour will be treated as potential gross misconduct and could lead to employment being terminated.

Employees who believe they have been subjected to any form of discrimination, harassment or bullying can make a complaint using the Dignity at Work Policy (PER075) and the Grievance Procedures (PER071).

### **POLICY REVIEW**

The effectiveness of this policy and associated arrangements will be reviewed on a regular basis by the Company.