

AHR-POL-009
Company Equality
Policy

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1. Purpose

We are committed to eliminating discrimination amongst our workforce. Our objective is to create a working environment in which there is no unlawful discrimination and all decisions are based on merit. We are opposed to any form of direct or indirect discrimination being applied against employees of the company, or those who seek employment with company, on the grounds of their race, ethnic origin, religious beliefs, nationality, sex, sexual orientation, gender reassignment, marital/parental status, harassment, bullying, disability or age.

We will take every possible step to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, training, promotion, career management and every other aspect of employment are based solely on objective and job related criteria.

2. Scope

This policy applies to all employees, workers, agency workers, contractors and job applicants.

3. What is Discrimination?

Discrimination is unlawful when it takes place on one of the following grounds (the 'protected characteristics'):

- age
- disability
- gender re-assignment
- marriage and civil partnership
- pregnancy and maternity
- race
- ethnic or national origin
- religion or belief
- sex
- sexual orientation

Discrimination can take a number of forms:

- Direct discrimination is when someone is treated worse than someone else just because of a protected characteristic. For example, it would be direct discrimination if a manager excludes an employee from a training course just because she is gay.
- It is also direct discrimination when someone is treated worse than someone else because they associate with someone with a protected characteristic or because they are perceived to have a protected characteristic. For example, it would be direct discrimination if an employee ostracised a colleague because the colleague has a gay flatmate or because he thinks the colleague is gay.
- Indirect discrimination is when an apparently neutral practice or requirement disproportionately disadvantages one group and cannot be justified by the needs of the business. For example, imposing a requirement that job applicants must speak fluent English disproportionately disadvantages non-English groups and would be

unlawful unless it could be justified on genuine business grounds.

- It is also discrimination when a disabled person is treated unfavourably because of something connected to their disability and this cannot be justified by the needs of the business or when the business fails to make reasonable adjustments for a disabled person.

4. Our Responsibilities and Approach

We aim to avoid discrimination in all aspects of employment and recruitment. Our approach to different aspects of employment and recruitment is set out below.

4.1 Recruitment and Selection

We aim to ensure that job requirements and job selection criteria are clear and based only on what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.

We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups and which are not justified by the demands of the job.

For all jobs, we will draw up a clear and accurate job description to ensure that we remain focused on what the job involves and the skills, experience and qualifications which are relevant and necessary to do the job. Shortlisting for interview will, wherever possible, be done by two or more people. We will endeavor to ensure that this involves the direct line manager and HR. If we hold interviews, we will try to ensure that more than one person conducts them to ensure that we avoid unintentional bias.

We will not ask for personal or irrelevant information on application forms or in interviews. We will focus instead on whether someone has the relevant skills, qualities and experience to do the job. All applications will be treated confidentially and circulated only to individuals involved in the recruitment process.

A range of recruitment options may be used depending on the vacancy, these may include the use of agencies, advertisements in newspaper, publications, and journals, on the company website or other online job boards or any other appropriate method. Information on all vacancies will be made available to existing staff allowing them the opportunity to apply.

Prior to interview consideration will be given as to whether any adjustments need to be made to accommodate any interviewee that has indicated a disability. In addition all candidates will be provided with information about the job role to allow them to prepare, along with a company application form to ensure that consistent information has been provided for each candidate. Where appropriate, skills tests may form part of the interview process.

When a suitable candidate has been identified and offer of employment will be made, subject to;

- references being received which are satisfactory to the company. Current employers will not be approached for a reference without prior express permission from the candidate.

- sight of relevant qualification documents
- relevant documents confirming the individuals right to work in the UK. (see appendix)
- a medical examination/health questionnaire if deemed necessary for the job. All requirements under the Access to Medical Reports Act 1988 will be observed.

In the case of internal appointments the employee will be made aware of the conditions attached to the new role, for example; salary, benefits and what will happen if they are unsuccessful in their new role.

All appointments are made subject to satisfactory completion of a probationary period, employees will be monitored during that period and feedback given on progress. The probationary period may be extended if there is doubt about the employee's suitability for the role. A recommendation on whether employment should be; confirmed, probationary period extended or terminated should be discussed at the probation review and the outcome confirmed to HR.

4.2 Promotion and Training

Promotion and training decisions will be made on the basis of merit. We will not unlawfully discriminate against any employee in making promotion or training decisions. We believe all employees should have an equal opportunity to progress and develop.

We will advertise promotion and transfer opportunities widely, including deputising opportunities and secondments which could lead to permanent promotion. We will try to ensure that training and development opportunities are made known to all relevant employees.

4.3 Positive Action

For some recruitment and promotion exercises we may take positive action to address under-representation in our workforce by encouraging applications from people from certain under-represented groups. For example, we may state on advertisements that we particularly welcome applications from certain groups, we may target our advertising towards particular groups, we might hold open days, work shadowing opportunities targeted at particular groups or we might provide training for particular groups to prepare them for promotion. However, we will ultimately make recruitment and promotion decisions on merit and not on the basis of protected characteristics.

4.4 Working Conditions and Terms of Employment

We will try to accommodate cultural or religious practices such as prayer requirements where we reasonably can.

We aim to ensure that our terms of employment, benefits, facilities and policies are free from unlawful discrimination.

We will ensure that decisions made under our disciplinary, grievance and health and attendance management policies are carried out fairly and without discrimination.

4.5 Termination of Employment

We will ensure that we avoid discrimination in making decisions about dismissal or redundancy.

Where possible we will ensure that any manager's decision to dismiss an employee is endorsed by another manager and the HR department.

4.6 Disabled Employees

We will make adjustments to accommodate disabled employees where possible and reasonable. For example, we can provide extra equipment or support, we can re-arrange duties and we can make changes to our premises in appropriate cases. If you think you may have a disability, you are encouraged to tell the business about this so that we can explore what adjustments might be appropriate.

5. Your Rights and Responsibilities

You have the right not to experience unlawful discrimination in our workplace. You also have a responsibility to understand this policy and help us to implement it. All employees, agency workers and contractors have a duty not to discriminate against each other and not to help anyone else do so.

5.1 Our Relationship with Visitors, Customers and Suppliers

You must not discriminate against any of our visitors, customers or suppliers. Equally, we expect our visitors, customers or suppliers not to discriminate against you and we will take appropriate action against anyone found to have done so.

5.2 What to do if you have been discriminated against

If you believe you may have been discriminated against, please tell us. You can speak informally with your manager or anyone in HR. If you want to make a more formal complaint, you are encouraged to raise the matter through our Grievance procedure. If you believe there has been any bullying or harassment then you should raise the matter through our Bullying and harassment procedure.

Allegations of potential breaches of this policy will be treated seriously. Employees and contractors who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under our disciplinary procedure.

5.3 What will happen if you act in a discriminatory way?

If, after investigation, we decide that you have acted in breach of this policy you may be subject to disciplinary action up to and including dismissal. This applies to the most senior levels of management as well as to all other employees.

6. Status of this Policy

This policy does not give contractual rights to individual employees. We reserve the right to alter any of its terms at any time although we will notify you in writing of any changes.

Appendix A – Right to Work in the UK

With effect from 12 July 2016, under section 24B of the Immigration Act 1971 (as inserted by section 34 of the 2016 Act), a person commits the offence of illegal working if they are:

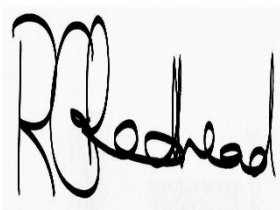
- Subject to immigration control and works when disqualified from doing so by reason of immigration status; and
- At the time, knows or has reasonable cause to believe that they are disqualified from working by reason of immigration status.

As an employer, the company has a duty to prevent illegal working. We will therefore conduct document checks to make it harder for people with no right to work in the UK to unlawfully obtain or stay in employment, and to make it easier to ensure that the company only employs people who have permission to do the work in question.

We will conduct right to work checks on all potential employees. This means all prospective employees will be required to provide us with their documents. To ensure that we do not discriminate against anyone, all job applicants will be treated in the same way at each stage of the recruitment process.

No assumptions about a person's right to work in the UK or their immigration status will be on the basis of their colour, nationality, ethnic or national origins, accent or length of time they have been resident in the UK.

All right to work checks will be carried out in accordance with the current government guidance on conducting right to work checks and acceptable documentation to prove the right to work in the UK.



Signed: Robert Gavin Redhead
Position: Commercial Director
Date: 16/02/2021

Revision Log

Issue	Date Issued	Revision Date	Revision	Authorised By
1	16.01.2017	N/A	Policy to incorporate the Recruitment and Selection Policy, Equal Opportunities Policy and Ethical Policy	RGR
2		22.01.2020	Changed formatting of document along with new branding.	AB



Annual Reviews

Date	Name / Position	Contact Details
22.01.2020	Gavin Redhead, Commercial Director	Gavin.redhead@astley-uk.com
16.2.2021	Gavin Redhead, Managing Director	Gavin.redhead@astley-uk.com