



Equality and Diversity Policy

1. INTRODUCTION

1.1 Policy Statement

1.1 The Company is committed to ensuring that it provides equality of opportunity through employment and service delivery. This commitment to equality of opportunity is a core value of the company.

1.2 The Company recognizes diversity within its workforce and values this diversity as strength and recognizes that this diversity is essential to provide a service to all its customers. It will ensure that the different needs and expectations of its diverse workforce are met.

1.3 The Company's approach to Equality and Diversity is based on the principle of inclusion. At its heart is a commitment to the value that all staff brings to the organization because of their diverse characteristics. These cover not only race, gender and disability but also factors such as age, marital status, sexuality, religion, background, personality and work style.

1.4 The Company will work hard to ensure that, as an employer, it will provide an employment environment in which people have the opportunity to contribute and develop according to their individual merits and aspirations.

1.5 The Company recognizes that there is also a strong business case for placing a positive value on diversity in the workforce

1.6 The Company will not discriminate directly or indirectly through applying conditions or requirements, which contravene legislation and/or which, cannot be shown to be justified.

1.7 The Company is committed to promoting an environment where a fair and equitable service is provided to customers.

1.8 It is the responsibility of every employee to uphold and implement this policy and it is the responsibility of managers to plan, manage, monitor and regularly review this policy.

2 AIMS & SCOPE OF THIS POLICY

2.1 The Company's Equality and Diversity Policy seeks to ensure that equality remains an integral and contributory part of achieving the Company objectives

2.2 This policy applies to every employee, our customers and those to whom we are customers.

2.3 The Company is committed to:

- The elimination of unfair or unlawful discrimination against its employees, job applicants and its customers.

- The positive promotion of policies, procedures and practices designed to support equal opportunity at all stages of employment, in its provision/delivery of services to customers and with its business affairs in the community.
- The use, development and retention (wherever possible) of the full range of skills and talents of its employees, regardless of race or colour; gender or marital status; disability, religion, sexuality and any other factors which are not relevant to people's ability or potential, except where this would result in a risk to the public and/or to employee safety.

2.4 The Company will act within the letter and spirit of equal opportunity legislation and related codes of practice. The Company also recognizes that unfair treatment can occur on grounds not covered directly by these laws (such as age, religion and sexual orientation) and will extend the principles of equal opportunity to include individuals or groups affected by these factors.

2.5 The Company will not tolerate processes, attitudes and behavior that amount to discrimination, including harassment, victimization and bullying through prejudice, ignorance, thoughtlessness and stereotyping

3. LEGISLATION

3.1 The Company is committed to eliminating unlawful discrimination and achieving equality of opportunity as an employer.

3.2 The Race Relations 1976 Act (as amended by the Race Relations Amendment Act 2000)

3.2.1 This act makes it unlawful to discriminate against anyone on the grounds of race, colour, nationality (including citizenship) or ethnic or national origin.

3.2.2 The amended act imposes positive duties on public authorities to eliminate racial discrimination and to promote racial equality in relation to jobs, training, housing, education and the provision of goods, facilities and services.

3.2.3 The act also imposes a positive duty on all major public bodies in promoting equality of opportunity and good race relations.

3.3 Sex Discrimination Act 1975 and 1986

3.3.1 This act makes it unlawful to discriminate against anyone on the grounds of gender or marital status. The act covers employment, education, and provision of goods, services, facilities or accommodation.

3.4 Disability Discrimination Act 1995

3.4.1 This act makes it unlawful to discriminate against anyone on the grounds of disabilities. The act covers employment, access to goods and services, transport, education buying/renting of land or property.

3.5 Equal Pay Act 1970 (as amended) 1983

3.5.1 This act requires that employers should provide equal pay for, broadly speaking, and work of equal or equivalent value for their employees.

3.6 Trade Union & Labour Relations (Conciliation) Act 1992

3.6.1 This act makes it unlawful for an employer to discriminate against/harass an employee on the grounds of membership or non-membership of a trade union or taking part in trade union activities.

4. DISCRIMINATION

4.1 What is Discrimination?

4.1.1 Prejudice is the attitude and discrimination is the act. The Company recognises that discrimination can take different forms, all of which are unacceptable.

4.2 Types of Discrimination

4.2.1 Direct Discrimination & Indirect Discrimination

- Direct discrimination is where a person, in a group of people with the same or similar circumstances, is treated less favourably than the others in the group because of their race, gender, disability or sexuality
- Indirect discrimination is where an unjustifiable requirement or condition is applied, apparently; equally on all groups of people but in practice, its impact is greater on one particular group than on the others.

4.2.2 Institutional Discrimination

- Institutional discrimination consists of the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture, ethnic origin, gender or disability etc. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance; thoughtlessness and stereotyping which further disadvantage such people.

4.3 Eliminating Discrimination

4.3.1 This policy sets out the Company's commitment to opposing all form of discrimination and will therefore ensure that its employees, job applicants are not discriminated against on the basis of any of the following:

- Race, colour, ethnic group or national origin
- Gender or marital status
- Disability
- Sexuality or sexual orientation
- Age
- Employment status
- Actual/suspected HIV/AIDS
- Religion and faith

- Trade union activities
- Unrelated criminal offences/ex-offenders (subject to any legal or public interest constraints)
- Responsibilities for children or dependents

5. HARASSMENT

5.1 Harassment is capable of being discriminatory and can be described as inappropriate actions, behaviour, comments or physical contact, which may cause offence i.e. mental or physical anxiety or hurt to an individual. It may be related to gender, race, disability, sexuality, age, religion, nationality or any personal characteristic of an individual. Such action is considered as less favourable treatment in that people who are harassed may feel less comfortable in the service/working environment or may even decide not to pursue their right to receive the service.

6. VICTIMISATION

6.1 Victimisation can be described as treating an individual less favourably than one would treat others because the individual has made a complaint of discrimination, given evidence about such a complaint or raised a concern under the Public Interest (Disclosure) Act 1998 and the Company's Confidential Reporting Policy (a separate policy).

7 REQUIREMENTS & RESPONSIBILITIES UNDER THE POLICY

7.1 Requirement

7.1.1 The Company's commitment to equality and diversity needs to be widely and effectively communicated throughout the workforce and to potential employees and contractors.

7.1.2 for this purpose:

- A statement of the Company's commitment to diversity and equal opportunity (e.g. Statement of Intent and Aim of this Policy), shall be displayed at each work location and all other company buildings.
- The principles of equal opportunity must be integrated into all Company Policies e.g. recruitment & selection, disciplinary, grievance, performance management etc.
- A copy of this Policy will be held and be available for inspection by employees.
- All new entrants and contractors will be given a copy of the Company's diversity and equal opportunities statement as part of their induction package.
- Agencies and contractors working on behalf of the Company must be able to demonstrate their commitment to equal opportunities and the requirements under the Company's equality and diversity policy.

- All human resource and organisation practices will be kept under review to ensure the elimination of unjustified bias or prejudice, whether or not such discrimination is barred by legislation.
- The Company will establish performance indicators to monitor measure and evaluate the Company's progress towards achieving its corporate equality objectives and strategy.

7.2 Responsibilities

7.2.1 The Company will

- Create an environment where equality and diversity is valued and its employees and customers are treated fairly and on an equitable basis.
- Integrate equality and diversity within the Company's Strategic and Corporate Objectives.
- Promote equality and diversity in the workplace and in providing services to the community.
- Deter discrimination by making it clear to all that discrimination is unacceptable and will be treated as a serious matter and a disciplinary offence.
- Provide training to Managers, Supervisors, employees and others to ensure that the Company's commitment to equalities and diversity is known and understood.
- Provide appropriate training and guidance to support Managers and employees in fulfilling their individual responsibilities under this policy.
- Regularly monitor and review all systems and procedures used in the provision of services to ensure equality, responsiveness, sensitivity and accessibility.
- Monitor organisational and employee performance and evaluate these against equalities objectives.
- Work in partnership with employees and unions in promoting equality and diversity in the workplace and in-service provision.
- Work in partnership with the voluntary and private sector to develop good practice on issues of access.

7.2.2 Managers will demonstrate commitment to the Policy by incorporating it into their service plans.

- Be responsible for the implementation and monitoring of the policy within their service areas.
- Ensure that the policies and strategies are communicated to all employees and allow for discussion and feedback. i.e. Employment Development Performance Appraisal (EDP's) to

- include references to practical targets on achieving equality and diversity.
- Help create a working environment which is free from discrimination, including harassment, victimisation and bullying.
- Ensure that all employees understand their responsibilities i.e. any form of discrimination will not be tolerated and will be treated as a serious offence, which could lead to disciplinary action, not excluding dismissal.
- Effectively manage and deal promptly and thoroughly with any complaints of discrimination including harassment, victimization and bullying.
- Deal promptly with complaints of inequality from customers, members of the community and employees and ensure the matter is investigated thoroughly and any other steps taken.
- Consider their actions and ensure that there is no scope for discriminatory practices. They must ensure fairness and equality of treatment in all employment practices e.g. to assess the performance and potential of any individual on merit and without regard to stereotypes and assumptions.
- Monitor and provide quarterly reports, on service-related complaints of inequality, to Executive Directors and the Corporate Equality Diversity Group.

7.2.3 Employees will implications i.e. that any breach of the policy will be treated seriously and may lead to disciplinary action not excluding the sanction of dismissal.

- Ensure that they do not discriminate in any matter of employment or service provision/delivery by treating both colleagues and customers fairly, equitably and respectfully.
- Ensure that they work towards and meet equality targets set within their (EDP) and report any factors which may impede these being met. ☒ Not discriminate against, harass, abuse, intimidate or victimise other employees or service users.
- Not induce or attempt to induce other employees to discriminate against, harass, intimidate or victimise other employees or service users.
- Take appropriate action if there are apparent breaches of the policy.
- Contact any of the following:
 - Your manager or the next tier manager
 - Your Trade Union (if appropriate)
 - Human Resources, in the first instance, if you feel that you have not been treated fairly under this policy. They will ensure that a full and thorough investigation will be carried out and they will ensure that in doing so, no victimisation of any of the parties takes place.

7.2.4 Human Resources will

- Facilitate and regularly promote and report on strategic approaches and progress on corporate strategy and equality action plans/programmes.
- Develop and support the implementation of equality and diversity action programmes.
- Analyse and report on the results of Company monitoring.
- Assist Managers with devising their local equality and diversity strategies and action plans/programmes.
- Provide corporate management information, review, and monitor and evaluate equality and diversity related issues such as disciplinary, grievances, training and employment.
- Provide equality and diversity awareness and training programmes.

7.2.5 Personnel Teams will

- Ensure that procedures, practices, advice and guidance provided are consistent, and lie within the framework of the requirements under this Policy.
- Co-ordinate and analyse the results of equality monitoring.
- Work with and support managers within the Clusters on the implementation of this policy and any supporting action plans/programmes.
- Facilitate and provide professional advice and guidance to Managers, Supervisors, Team-Leaders and employees, regarding this policy.
- Regularly review and monitor progress towards the achievement of local equality objectives/targets.
- Maintain local/monitoring information and produce information to facilitate corporate monitoring.

7.2.6 Trade Unions

The Company recognises that the Trade Unions share its objectives of eliminating discrimination and promoting equality and diversity initiatives/programmes. Therefore, the Company will encourage Trade Union involvement in promoting equality of opportunity in having and participation in joint initiatives and regards this as a matter for full consideration and commitment.

7.2.7 Service Users

All clients are expected not to discriminate against, induce discrimination or permit discrimination and to report any apparent instances of discrimination to an appropriate

person/manager of the service. The Company's Policy will be made known to the public and any breach of the policy may lead, subject to any legal constraints, to suspension of services to any user found to have done so.

8 MONITORING

8.1 The policy and procedure will be subject to regular review on the basis of good practice and monitoring data, to evaluate the success of initiatives and implementation of this policy and; to provide a platform for improvement.

9 IMPLEMENTATION OF THE POLICY

9.1 All employees, trade unions, agents of and contractors with the have a responsibility and a role to play in the implementation of this Policy. The Company will actively promote this policy and do the following to ensure that this policy is fully effective:

- Regularly review, monitor and evaluate all policies, procedures and practices both in service delivery, employment and resources allocation from an equality perspective to ensure that they conform to this policy.
- Communicate policies and procedures to employees, clients, contractors and agents as appropriate.
- Build equality/diversity targets where appropriate into EDP processes for staff.
- Take appropriate action (using agreed procedures) if any employee breaches the conditions of this policy.
- Provide training and guidance to all employees, particularly for personnel staff, line manager, supervisors and team-leaders to ensure that they understand their legal and corporate responsibilities.
- Provide positive action training programmes (where legally permissible) to under-represented groups to redress current imbalances e.g. through recruitment, career planning and training.

Kevin McLoughlin

Director



Signed:

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