

Red Snapper Group

Equal Opportunities and Diversity Policy

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1. Introduction

The Company is 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 do not discriminate against staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics).

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

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 employees, regardless of their status. Employee attention is drawn to our separate anti-harassment and bullying policy.

Any and all personal data used in connection with this Policy shall be collected, held, and processed in accordance with the Company's Employee Data Protection Policy.

2. Equal opportunities training

Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice. If employees are involved in management or recruitment, or if they have any questions about the content or application of this policy, employees should contact their line manager.

3. Scope and purpose of the policy

This policy applies to all aspects of our relationship with our employees and to relations between employees at all levels. This applies to 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.

We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

This policy is non-contractual in its effect and does not form part of normal terms and conditions of employment, unless otherwise stated in the employee's contract of employment.

4. Forms of discrimination

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 set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

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 to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying 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.

5. Recruitment and selection

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics 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.

Job advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

We take steps to ensure that our vacancies are advertised to a diverse labour market. Where appropriate, use may be made of lawful exemptions which should be set out in the advertisement.

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

- a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- c) Positive action to recruit disabled persons.

- d) Equal opportunities and diversity 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 Human Resources (who should first consider whether such matters are relevant and may lawfully be taken into account).

We 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 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, we monitor applicants' ethnic group, gender, disability, 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 short-listing, 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. Any monitoring shall be done in accordance with the Company's obligations under GDPR.

6. 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.

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.

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.

7. Termination of employment

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

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

8. Disability discrimination

If an employee is disabled or becomes disabled, we encourage them to tell us about their condition so that we can support them as appropriate.

If an employee experiences difficulties at work because of a disability, they may wish to contact their line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The line manager may wish to consult with them and their medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate their needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

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

9. 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.

10. Part-time work

We 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. We will ensure requests to alter working hours are dealt with appropriately under our Flexible Working Policy.

11. Breaches of the policy

If an employee believes they may have been discriminated against, they are encouraged to raise the matter through our Grievance Procedure. If they believe they may have been subject to harassment they are encouraged to raise the matter through our Harassment Policy. If an employee is uncertain which applies or needs advice on how to proceed, they should speak to their line manager.

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 our Disciplinary Procedure.

Any employee 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. We take a strict approach to serious breaches of this policy.

12. Review

This policy will be reviewed annually by the policy owner. Revisions, however, may be made throughout the year.

13. Formal Sign Off

This Policy has been formally reviewed and signed off by top management:

A handwritten signature in black ink, appearing to read "M. Jerrold".

Martin Jerrold
Managing Director
Red Snapper
Group

End.