

# Equality Policy

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### **1. Aims and Objectives**

We are committed to eliminating discrimination amongst our workforce and our objective is to create a working environment in which there is no unlawful discrimination and all decisions are based on merit.

This policy has been agreed with senior management and has the full support of our board of directors.

### **2. Status of this policy**

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you of any changes and an updated version uploaded onto The Company Intranet.

#### **2.1. Eligibility**

This policy applies to all employees, workers, agency workers, contractors and job applicants of The RTC Group and subsidiary companies.

#### **2.2. Responsibility for this policy**

The Group HR Department are responsible for this policy.

### **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
- 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.

### **5. Recruitment and Selection**

We aim to ensure that job requirements and job selection criteria are clear and based only 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.

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.

## **6. Promotion, Training and Appraisals**

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 try to ensure that training and development opportunities are made known to all relevant employees.

Training needs will be identified through regular reviews/training needs analysis/appraisal discussions.

We have a formal appraisal system which helps us to ensure that employees are being assessed fairly on the basis of job performance and are not being discriminated against. We will conduct appraisals objectively and measure performance in a transparent and objective way, without prejudice or bias.

## **7. Working Conditions and Terms of Employment**

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

We aim to ensure that our terms of employment, benefits, facilities and policies are free from unlawful discrimination and will review our benefits and facilities regularly to ensure that they are available to all employees/contractors who should have access to them and that there are no unlawful obstacles to accessing them.

We will ensure that decisions made under our ***Disciplinary, Grievance, Performance Improvement and Absence Policies*** are carried out fairly and without discrimination.

We will open up as many jobs as possible to flexible working arrangements and will allow all employees to apply for flexible working, and not just those with particular protected characteristics.

We aim to ensure that our pay systems are transparent, fair and free from discrimination.

## **8. 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/or The Group HR department. We will encourage leavers to give feedback about their employment in exit interviews.

## **9. Disabled Employees**

We will make adjustments to accommodate disabled employees where possible and reasonable. 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.

## **10. Training on Equalities**

We will train our managers and those responsible for recruitment on understanding and avoiding discrimination.

## **11. Monitoring**

We may ask job applicants, employees and contractors for information about some of their protected characteristics. We do this to help us to:

- establish whether our equality policy is effective in practice;
- analyse the effect of other policies and practices on different groups;
- highlight possible inequalities and where appropriate investigate their underlying causes; and
- take action where we think it is needed to address problems or reduce disparities.

We collect this information anonymously and we will use it only for monitoring purposes and not for any other purpose. We will protect the confidentiality of the information given to us.

Some examples of the type of monitoring we may carry out are as follows:

- how many people with particular characteristics apply for each job, are shortlisted and recruited;
- how many people in the workforce have a particular protected characteristic and the levels within the organisation that they are employed at, their length of service and their resignation rates and patterns;
- the protected characteristics of staff attending training;
- the satisfaction levels of staff with a particular protected characteristic;
- the protected characteristics of employees using the ***Grievance or Bullying and Harassment Procedures***; and
- the protected characteristics of employees who are disciplined or dismissed.

## **12. 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, workers, agency workers and contractors have a duty not to discriminate against each other and not to help anyone else do so.

### **13. Our Relationships with Visitors, Customers and Suppliers**

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

### **14. 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 Line Manager or a member of The Group HR Department. 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***.

### **15. 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.

### **16. Policy Review and Promotion**

We will promote and publicise our Equality Policy as widely as possible using our intranet, website, application packs, induction packs, notice boards, handbooks, and annual reports.

We will review our Equality Policy on a regular basis.

### **17. Other Policies**

- ***Bullying and Harassment Procedure***
- ***Grievance Procedure***
- ***Disciplinary Procedure***
- ***Performance Improvement Procedure***
- ***Absence Policy***