

Equal opportunities policy

Objectives

To ensure that the talents and resources of employees are utilised to the full and that no job applicant or employee receives less favourable treatment on the grounds of gender, age, marital or civil partnership, social class, race, ethnic origin, religious belief, sexual orientation, pregnancy or maternity, gender reassignment or disability or is disadvantaged by conditions or requirements, which cannot be shown to be relevant to performance.

Policy

To this end the Company will:

Fulfil its social responsibility towards its employees and the communities in which it operates. Recognise its legal obligations under the Equal Pay Act 1970 (Equal Value Amendment 1984), Rehabilitation of Offenders Act 1974, Sex Discrimination Act 1975 (Gender Reassignment Regulations 1999), Race Relations Act 1976, Disability Discrimination Act 1995, The Protection from Harassment Act 1997, Race Relations (Amendment) Act 2000, Race Relations Act 1976 (Amendment) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003, Employment Equality (Religion or Belief) Regulations 2003, Disability Discrimination Act 2005, Employment Equality (Age) Regulations 2006, Equality Act 2010, The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

Review periodically its selection criteria and procedures to maintain a system where individuals are selected, promoted and treated solely on the basis of their merits and abilities, which are appropriate to the job.

Seek to give all employees equal opportunity and encouragement to progress within the Organisation by implementing a positive action programme.

Distribute and publicise this policy statement throughout the Company and elsewhere as is from time to time appropriate.

Provide facilities for any employee who believes that inequitable treatment has been applied to him or her within the scope of this policy to raise the matter through the appropriate grievance procedure.

Provide within the action programme, to all employees, training which may improve their prospects within the Company and which will enhance employees

understanding of the need for an equal opportunity programme

Responsibilities

All employees have a responsibility to accept their personal involvement in the practical application of this policy but specific responsibility falls upon managers, supervisors and staff professionally involved in recruitment, employee administration and training.

WE ARE AN EQUAL OPPORTUNITY EMPLOYER

Code of practice:

Aims

To promote equality and avoid discrimination either directly or indirectly on the grounds of age, gender, marriage & civil partnership, pregnancy & maternity, religion or belief, race, sexual orientation or disability.

Types of Discrimination:

Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see perception discrimination below), or because they associate with someone who has a protected characteristic (see discrimination by association below).

Discrimination by association

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

Perception discrimination

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

Indirect discrimination

This applies to race, age, disability, gender reassignment, sex, religion or belief and sexual orientation. Indirect discrimination can occur when you have a condition, rule, policy or even a practice in the company that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if the company can show that we acted reasonably in managing the business, i.e. that it is 'a proportionate means of achieving legitimate aim'. A legitimate aim might be any lawful decision made in running the business or organisation, but if there is a discriminatory effect, the sole aim of reducing costs is likely to be unlawful. Being proportionate really means being fair and reasonable, including showing that you've looked at 'less discriminatory' alternatives to any decision you make.

Harassment

Harassment is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual". Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees can now complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and protected characteristic

Third party harassment

The Equality Act makes the company potentially liable for harassment of employees by people (third parties) who are not employees of your company, such as customers or clients. The company will only be liable when harassment has occurred on at least two previous occasions, the company is aware that it has taken place, and have not taken reasonable steps to prevent it from happening again

Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint. There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

Action

As a Company, we have a positive action programme to support our Equal Opportunities policy.

1. An Equal Opportunities Policy Statement is displayed on all Notice Boards.
2. Changes are made to recruitment, training and career development practices as necessary.

Recruitment

The recruitment process must result in the selection of the most suitable person for the job in respect of experience and qualifications.

It is against Company policy and, against the law to discriminate either directly or indirectly on the grounds of age, gender, marriage & civil partnership, pregnancy & maternity, religion or belief, race, sexual orientation or disability at any stage of the recruitment process.

In particular, where it is clear that internal advertising is unlikely to result in applications from women and/or black and ethnic minority or disabled candidates, external advertising will take place as well.

Check that:

- All jobs are made open to all applicants except in the case of a job covered by Genuine Occupational Qualification.
- No assumptions or pre-judgements are made by managers or recruiters about the suitability of any sex or race for a particular job. (For example, preferences of co-workers, customers, or suppliers must not be pre-supposed. It is not to be assumed that jobs involving heavy physical labour, late hours travel, or unpleasant surroundings are necessarily unsuitable for women or the disabled.
- No decision is made, or preference stated, in advance regarding the outcome of the recruitment process. (For example: by instructing a Personnel Officer not to recruit a woman or disabled person).
- All applications are given equal consideration.
- No discrimination is made in the terms on which a job is offered, for example, pay or holidays.
- All applicants and existing staff are made aware of the Company's policy and practice on recruitment. The Company Policy Statement must be included in the Personnel Manual and the Company Rules.

Recruitment publicity

Recruitment publicity must positively encourage applications from all suitably qualified and experienced people.

It must show that the Company offers opportunities at all levels to people of either sex, any colour and of all races, and to those who are disabled and should avoid any stereotyping of roles. Recruitment solely or in the first instance, by word of mouth or through recommendations of existing employees can be unlawful and should be avoided.

Check that:

- Copies of the Company's written Equal Opportunities Policy are given to all the recruitment and advertising agencies with which we deal and that they are suitably briefed.
- In all recruitment, publicity literature and in all internal and external advertisements.
- It is stated that UGS Ltd is an Equal Opportunities employer and implements a programme to support this.
- Jobs titles and job content are presented without bias either of gender or race.
- Jobs are described in such a way that no qualified or experienced person is deterred from applying.
- There is nothing in either words or illustrations to indicate any role stereotyping. Illustrations showing men in managerial positions and women in clerical positions or white people supervising black people or workers of minority ethnic origin are particularly to be avoided.
- Vacancies are advertised in a wide variety of ways to ensure that all groups are informed. (Outlets should include appropriate newspapers and periodicals; employment agencies experiences in the recruitment of minority groups; job centres and careers offices; and schools, colleges and clubs).

Selection process

It is vital that the selection process is carried out consistently for all jobs at all levels within our organisation and that it is seen to be fair and non-discriminatory

Application forms

Application Forms are to include only those questions, which are necessary at the initial stage of selection.

Check that:

- All application forms state simply that UGS Ltd is an Equal Opportunities employer and implements a programme to support this.
- All questions on the application form are relevant and non-discriminatory.
- Application forms include only those questions, which are essential at this stage.
- No discrimination is made on the basis of postal code or address.

Interviews

Interviews are to be conducted by trained personnel. All questions will be strictly relevant to the job. In no case will questions be asked or assumptions made about a person's personal and domestic circumstances or plans. Where the requirements of the job will affect the candidate's personal life (i.e. unsociable hours or extensive travel) this should be discussed objectively. Information necessary for personnel records will be collected only when the offer of a job has been made.

Check that:

- Staff and managers who conduct recruitment interviews are trained: -
- To take an unbiased approach regardless of the applicant's age, gender, marriage & civil partnership, pregnancy & maternity, religion or belief, race, sexual orientation or disability.
- To ask only questions which relate to the job and which are non-discriminatory (For example, questions about marriage plans and intention to have a family may be construed as showing discrimination against women.)

Selection criteria

Only those qualifications and skills, which are essential for the job, are to be established as criteria for selection. They may include educational and professional qualifications, experience, the ability to speak and write 'good English and physical abilities. They must not exclude minority groups, or discourage people with minimum qualifications from applying.

Requirements for formal academic or professional qualifications may be waived if candidates can demonstrate their suitability for the job by other means. The candidate's previous experience and willingness to undergo further training will both be taken into account.

Check that:

- All selection criteria are strictly job-related
- The selection criteria do not exclude the groups targeted in the action programme.
- The acceptability of equivalents to formal qualifications is stated.
- Positions are not advertised as 'full-time' unless this can be justified.
- (The Company could be found to be acting unlawfully).

Educational and professional qualifications

The Company should not insist on higher educational or professional qualifications than are strictly necessary for the job. In assessing educational qualifications it should not be assumed that overseas degrees or diplomas are of a lower standard than their U.K. equivalents.

Check that:

- All requirements for educational and professional qualifications are valid and job-related.
- Overseas degrees and diplomas are properly assessed.
- Candidates who are suitable for the job but do not have formal qualifications for it are encouraged to undertake further training (further education, community-based courses, and in-house training courses).

Experience

We are concerned that, wherever possible, experience may count as an equivalent to professional qualifications, and that the value of past experience is accurately assessed.

Check that:

- Due recognition is given to experience as a substitute for formal qualifications wherever possible.
- All previous experience is taken into account, including: paid employment; voluntary and community work; work within the home; and family responsibilities and experience.
- Prime consideration is given to the relevance and regency of an applicants experience rather than to the length of time spent in a particular job or type of job.

Age restriction

The setting of age limits as a matter of general recruitment policy or as a criterion of any specific job must be justifiable, and non-discriminatory.

Check that:

- Any age restriction, which is made, is demonstrably valid.
- The setting of age limits is non-discriminatory.
- An example of discrimination in this respect is to set a requirement for the age range during which many woman have dropped out of the labour market to rear their families.

Mobility requirement

Mobility requirements can cause problems for all employees. We recognise that the whole family is affected if an employee's job requires her or him to travel extensively or to move. We are therefore concerned to keep such requirements to a minimum and to devise alternatives for any employee who has difficulty in meeting such requirements.

Check that:

- Requirements for travel or removal are demonstrably valid and non-discriminatory.
- Consideration is given to alternatives such as:
- Partial mobility within a region or area.
- Making some of the total number of employees doing any particular job residential, and some mobile. (Both mobile and residential staff will be eligible for promotion).

Shift work/overtime

No discrimination will be made in arranging shifts or overtime by assuming that certain groups, for example women, do not wish or are unable to do such work.

Check that:

- Shift work arrangements are made without either direct or indirect discrimination.
- Overtime is offered to all employees, on an equitable basis.

Training

Training is provided for our employees in order to increase their knowledge and skills. This has the advantage to the Company of greater efficiency and potential, while to the employee it opens up new opportunities and prospects.

Check that:

- Training courses and procedures are continually updated.
- Training courses and materials are free from bias, and do not discriminate. (For example by showing women or black people, ethnic minority groups or disabled people in inferior roles.)
- Specific areas requiring special Equal Opportunities training are identified and training programmes developed.

Training opportunities

Training opportunities will be made available to all employees. It is against Company policy and against the law to discriminate directly or indirectly, either in the selection of candidates for training courses or in the arrangements made for selection.

Check that:

- Part-time employees have the same opportunities as full time employees.
- Access to training for managerial or specialised positions is made available to all employees, irrespective of gender, marital status, race, or disability.

Training and the equal opportunities programme

Training is a basic tool in achieving Equal Opportunities within our organisation. If in any specific type of job the proportion of black people or people of ethnic minority origin is low, we will provide, and are legally allowed to do so, training facilities for members of minority group concerned.

Check that:

- A session on Equal Opportunities is included in all induction programmes.
- The Equal opportunities training programme provides all staff with a training or personnel function with the knowledge, skills and awareness necessary to operate the legislation, company policy and code of practice.
- Women, black people and ethnic minority groups who are under-represented, either in a particular job or at certain levels within the company, in accordance with the positive discrimination measures allowed under Section 47 of the Sex Discrimination Act and Section 37 of the Race Relations Act.
- Appropriate additional training (for example on changes in technology) is made available to women returning to work after maternity leave or after a longer break to rear children.

- Company staffing targets, including those set for the progression of women, black people, ethnic minority groups and disabled people, are reviewed annually.

Training and assistance for minority groups

It is our policy to provide training for any employee who needs or will benefit from it. Additional training courses for women returning to work after a period of absence are examples of the assistance we will provide to employees who are disadvantaged in any way.

Career development

We are concerned that career paths within the Company should reflect the situation in the workplace, traditionally the preserve of adult males in continuous rapid and radical changes. More women are working now, with a break for child rearing, or continuously. Women are better qualified and more interested in meaningful jobs with prospects, and this is also true of black and ethnic minority people and those with disability.

As a Company, we recognise that many employees in these groups may be under-using their abilities and qualifications, and we are committed to identifying them with opportunities to develop their potential.

Check that:

- Qualifications and criteria for promotion and transfer are justifiable. (For example, promotion on the basis of length of service may be interpreted as unlawful indirect discrimination, as women are less likely to qualify).
- Policies make it quite clear that promotion and transfer are open to all suitably qualified and experienced personnel.
- Regular appraisal and performance reviews are made and discussions on potential, career development, and training are held with all employees. (Oral or written feedback on such interviews is to be made available to employees on request.)

Analysis of the staffing situation is used:

- To identify career structure and development processes
- To identify alternative entry points to career paths
- To check the career development progress of women, black people and ethnic minority groups and people with disability.
- To check the proportions of women, black people and members of ethnic minority groups holding management positions compared to lower zoned or graded jobs.

A formal process to identify employees with promotion potential is developed.

Job satisfaction

Practical changes and changes of attitude must be made in the employment of women, black people and members of ethnic minority groups. At present they mainly occupy, and are associated with lower graded or zoned jobs. We must identify people with potential and encourage appointments to higher grades. We must avoid stereotyped ideas linking certain groups of people with certain jobs in the lower grades to increase our employee's satisfaction in their jobs.

In the case of disabled people we need to pursue ways of reorganising or regrouping tasks so as to construct useful jobs suitable for e.g. partially sighted, or deaf or immobile employees, and to address career development issues with regard to this group.

Check that:

- Job associated with certain groups of people, e.g. 'A man's job', 'a woman's job', are identified and consideration given as how these jobs can be filled by members of any group.
- 'Short-ladder' jobs are identified and analysed to show patterns of gender or race and indications of job satisfaction, e.g. absenteeism and staff turnover.

- Action is taken to improve both job satisfaction and career progression.

Terms and conditions:

Pay

All employees doing equal jobs, regardless of gender, colour, race or disability, are to be treated equally with respect to pay and other conditions of their contracts of employment. This applies both where the work has been given an equal value under a job evaluation scheme and where the work is of equal value even though no job evaluation scheme exists.

Check that:

- A job evaluation scheme, recognised by management and unions, covers all divisions.
- All salaries are regularly checked to ensure that there is equal pay for equal work or value and those comparisons are made on an equitable basis.
- All increases are made on an equitable basis and the same rules are followed in all cases.
- The grade distributions in the performance appraisals on which merit payments depend are checked to ensure that the same criteria are applied to everyone.

Benefits, facilities and services

It is against Company policy and against the law to discriminate with respect to benefits, facilities and services. We will clearly define all the benefits, facilities and services to which our employees are entitled and ensure that they are made available to everyone of the same employment status irrespective of gender, marital status, race or disability.

Check that:

- All benefits, facilities and services to which our employees are entitled are in fact available to them.
- All benefits, facilities and services including these covered by law (e.g. maternity/paternity rights) are reviewed to see if and how they can be improved.

Part-time employment

Part-time work is desirable for many people, and can be of advantage to the Company. It is our policy to create opportunities for part-time work or job-sharing where possible, and to ensure that our part-time employees, some of whom are women, receive fair treatment.

Check that:

- Jobs or areas are identified where part-time employment could be introduced.
- Job sharing and similar schemes are considered at all levels.
- Part-time workers are recruited to the jobs so identified.
- A review is made by each Company of the position of part-time workers in relation to pay, training and promotion.

Responsibilities of managers and supervisors

The success of our Equal Opportunities programme depends on the managers and supervisors at all levels in the Company. They must be made aware of what is expected of them by the Company and what is required of them by law, and given continuous training and support.

Check that:

- All managers and supervisors are briefed on their responsibilities and supported by regular training.
- Managers at all levels are aware of the Equal Opportunities performance of their subordinate managers and supervisors, and that assessment of that performance is included in the annual performance appraisal.
- All managers who are responsible for selecting employees for training or for allocating work ensure that no discrimination is made, either directly or indirectly. All employees are to be given equal access to training, further education, personal development, and increased job satisfaction, regardless of gender, marital status, race or disability.
- All managers and supervisors take positive steps to enable the recruitment of traditionally disadvantaged groups and to assist them to qualify for available job openings.
- Managers promote Equal Opportunities to their staff and encourage people of both Sexes and different races to work together and eliminate discrimination.



Michael Collyer
Director
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