



Diversity and Equal Opportunities Policy

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1. Introduction

The Company is committed to promoting equal opportunities in employment and creating an inclusive working environment in which diversity is valued and celebrated.

This policy is designed to assist the Company in providing equal treatment to all. Under the Equality Act 2010 it is illegal to discriminate, whether directly or indirectly, on the grounds of any of the 'protected characteristics' defined below. The Company recognises that diversity promotes innovation and business success as each employee brings unique capabilities, experiences and characteristics to the workforce, increasing creativity, flexibility and productivity.

An important aspect of ensuring equal opportunities in employment is striving to ensure that everyone is treated with dignity and respect and the work environment is free of harassment and bullying. This policy is supplemented by the Company's harassment and victimisation policy and procedure, grievance policy, disciplinary policy and flexible working policy, which are available on the Company intranet (MyOCS).

This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. Scope

This policy applies to all employees, job applicants, consultants, clients, volunteers, interns, casual workers, agency workers and Company subsidiaries.

All areas of the Company's business are impacted by this policy including recruitment, career development and training, terms of employment and benefits, grievances and disciplinary procedures, dismissals and redundancies and the way we manage staff and interact with each other.

3. Aims

Through the creation of this policy, the Company aims to improve communication and information-sharing channels, reduce staff turnover and absenteeism due to the creation of a working environment in which respect and inclusiveness are promoted, and to develop better managerial styles, skills and performance in communication, people management, goal setting and planning.

In order to achieve this, this policy aims to ensure:

- All employees, job applicants and clients are treated fairly, openly and honestly, and with dignity and respect;
- No employee or job applicant is discriminated against on the grounds of a protected characteristic;
- Equality and diversity is promoted and celebrated in the working environment;



- Training, development and progression opportunities are open to all employees; and
- Breaches of the policy are taken seriously and treated with sensitivity.

4. Responsibilities

The Company expects each member of staff to ensure that a positive equal opportunities climate exists by treating others on their merits and by disassociating themselves from any form of direct or indirect discrimination, victimisation, or any type of harassment.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote diversity and equal opportunities.

5. Definitions

For the purposes of this policy, protected characteristics are defined as follows:

'Age' refers to a person's age group. An age group can mean people of the same age or people of a range of ages.

'Disability' refers to a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.

'Gender Reassignment' refers to people who are proposing to undergo, are undergoing or have undergone a process to reassign their sex by changing physiological or other attributes of sex. Under the Equality Act the person does not have to be under medical supervision.

'Marriage and Civil Partnership' - refers to people who share the protected characteristic of marriage and civil partnership. Single people and people in relationships outside of marriage or civil partnership (whether or not they are cohabiting) do not have this characteristic. A civil partnership is a registered union under the Civil Partnership Act 2004, including those registered outside the UK.

'Pregnancy or Maternity' refers to a woman who is pregnant or is on maternity leave, including someone who is breastfeeding.

'Race' - includes colour, nationality (including citizenship) and ethnic or national origins.

'Religion or Belief' refers to any religion (including no religion), and any religious or philosophical belief (including a lack of belief).

'Sex' - refers to a man or a woman.



'Sexual Orientation'- includes persons who identify as homosexual, heterosexual and bisexual.

6. Discrimination

Individuals must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

Direct discrimination: treating someone less favourably because of a protected characteristic. For example, rejecting a job applicant because of their religious views or because of their sex.

Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular protected characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

Harassment: this includes sexual harassment and other unwanted conduct related to a protected characteristic, which 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 the Company's harassment and victimisation policy and procedure.

Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

In exceptional circumstances, employers can discriminate against an individual for a reason related to a protected characteristic where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim. For more information please contact the Resourcing team.

7. Recruitment and Selection

The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and redundancy. All promotion and rewards are decided on the basis of performance.



Job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary and a justified requirement for the role.

The Company will consider any possible indirect discriminatory effect of its standard working practices when considering requests for variations to these practices and will refuse such requests only if the Company has valid reasons, unrelated to any protected characteristic, for doing so. The Company will also take all reasonable and practicable steps to ensure that disabled people are able to participate on an equal basis with people who are not disabled.

The Company is 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 divisional Human Resources or UK Visas and Immigration.

8. Religious Observance

As a multicultural and diverse Company, the Company understands that at certain times some individuals may need to request to have time off or use some of our facilities for religious observance. The Company recognises that this is extremely important to staff and, although the Company is not obliged to, wherever possible will do all that it can to accommodate such requests.

For example, if an employee needs to find a room for prayer the Company will look to find a suitable room to be made available to them for an allotted time providing it does not disrupt others carrying out their duties or affect their own ability to carry out their work properly and that a suitable room is available.

The Company also recognises that requests may be made for the following:

- To provide flexible working including amending shift and break times
- To allow religious holidays and time off to observe festivals and ceremonies
- To provide for dietary requirements in staff canteens and restaurants; and
- To consider dress requirements.

Please note that the Company should be provided with sufficient notice when making such requests in order for them to be considered and alternative arrangements made if necessary. The Company may not be able to grant some requests on the grounds of health and safety or where the business would be unable to operate effectively resulting in a detriment to customer service and/or business operations. The Company will always



ensure that such requests are taken into consideration and alternatives are sought, however individuals must be aware that this may not always be possible.

9. Implementation, Maintenance and Review

This policy will be monitored periodically by the Company to judge its effectiveness and will be updated in accordance with changes in the law. In particular, the Company will monitor the ethnic and gender composition of applicants for jobs, and the number of people with disabilities within this group, and will review its equal opportunities policy in accordance with the results.

Employees who are disabled, or who become disabled, will be encouraged to provide information about their condition so that the Company can offer appropriate support. All reasonable adjustments will be made to ensure disabilities are accommodated within the workplace.

Staff with questions about the content or application of this policy, should contact the divisional Human Resources to request training or further information. Staff are also encouraged to comment on this policy and suggest ways in which it may be improved by contacting the Employee Relations team.

10. Non-Compliance

The Company will not tolerate any behaviour, actions, omissions or words that breach this policy. Non-compliance will be dealt with in line with the Company's disciplinary policy and procedure. In cases of harassment the Company's harassment and victimisation policy and procedure should be consulted. Under the Protection from Harassment Act 1997, serious cases of harassment can be regarded as a criminal offence.

If any member of staff feels that they have been treated unfairly, they should raise a grievance through the Company's grievance policy and procedure. If they feel it is inappropriate or they are unable to approach their line manager, they may approach an independent member of management or divisional Human Resources. All complaints will be treated in confidence and investigated as appropriate.

Victimisation or retaliation against staff who complain about discrimination will not be tolerated. However, making a deliberately false allegation will be treated as misconduct and dealt with under the Company disciplinary policy and procedure. Please note that employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination.