

	<b>SHEPLEY GROUP</b> <b>EQUAL OPPORTUNITIES POLICY</b>	Doc Ref: Issued Issue Date Review Date Auth/Rev/App Page:	HR009 2 09/2021 09/2022 CP/ST/NH 1 of 3
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We are committed to creating a working environment that provides and promotes equality of opportunity, dignity, respect, fairness and transparency, and prevents unlawful discrimination, bullying, harassment and victimisation.

Through the operation and communication of this policy, the company aims to meet this commitment.

The company opposes all forms of unlawful and unfair discrimination (directly or indirectly) and aims to prevent discrimination, through this policy, for any of the following protected characteristics, except where determined by lawful requirements.

- Age
- Disability
- Gender
- Gender Reassignment
- Sexual Orientation
- Marriage or Civil Partnership
- Pregnancy, Maternity or Parental Status
- Race (which includes colour, nationality and ethnic or national origin)
- Religion or Belief

The company will treat all breaches of this policy seriously and will implement the company's Disciplinary procedure where necessary.

### Types of Discrimination

*Direct Discrimination* is the less favourable treatment of an individual due to one or more protected characteristic.

*Indirect discrimination* occurs where a provision or practice is applied that is discriminatory to individuals who have a relevant protected characteristic such that it would be the detriment of people who share that characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

*Harassment* is unwanted behaviour or conduct, whether intentional or not, towards an individual who has one or more protected characteristic.

*Bullying* is the repeated unfair and unethical treatment of an individual. This includes Cyber-bullying.

*Victimisation* occurs when an individual is unfairly treated or subjected to a detriment due to making a complaint about discrimination or helping someone who has been discriminated against

### Principles

The company will avoid unlawful discrimination in relation to (but not limited to), the following subjects.

#### 1. Recruitment and Selection (incl. promotion)

Recruitment specifications and selection methods will be limited to those requirements that are mandatory for the role and candidates will be assessed against these requirements, taking into account any reasonable adjustments requirements for candidates with disabilities. Selected candidates will be required to follow an appropriate induction process to ensure that they are equipped to undertake the role as required.

## 2. Training and Development

Training and development opportunities will be available for employees with selection for such being made on the basis of both the needs of the company and the personal development of the employee, taking into account any specific requirements for employees with disabilities.

Training in equal opportunities will be provided to managers and other employees who have responsibilities and input into recruitment and selection (including promotion) decision making to ensure that they understand the legal requirements and responsibilities within this subject.

Training will also be provided to all employees to help them understand their rights, responsibilities and contribution to the company's commitment outlined in this policy.

## 3. Working Practices

The company will consider any possible indirect discriminatory effect of its standard working practices, such as working hours, patterns and locations, when considering requests for flexible working and will refuse such requests if the company considers it has good reason(s), unrelated to any protected characteristic, for doing so. For further details, please see the Flexible Working Policy.

The company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability, religious or cultural needs.

## 4. Religion or Belief

The company respects the right and freedom of employees to worship in accordance with their faiths, or no faith, subject to their respecting of the rights and freedoms of fellow employees and considerations for safety and welfare.

The company will not discriminate against anyone wishing to celebrate their respective religious events. Employees are required to use their annual holiday entitlement to cover time off to celebrate such events and must follow the company procedure for requesting holiday leave.

Where employees have a particular cultural or religious need, the company will consider whether it is reasonably practical to meet those needs whilst maintaining the efficiency of the business.

## 5. Disability

The company regularly reviews its facilities for disabled employees and will try to accommodate requirements wherever practical and within available resources.

The company will ensure that employees will have maximum access to employment opportunities and to meetings/events regardless of any disability.

## Monitoring and Review

To ensure that this policy is operating effectively, the company will monitor the ethnic, gender and age composition of the existing workforce and of job applicants (including promotion), and the number of people with disabilities within these groups. It will consider and take any appropriate action to address any issues that may be identified as a result of the monitoring process.

The company will also periodically review this policy to judge its effectiveness and will be updated in accordance with changes in legislation or company practices.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with Data Protection legislation.

### Responsibilities



All employees are expected to comply with this policy and to treat others with dignity at all times without regard to any of the protected characteristics (as outlined above) that they may have or be perceived as having.

Any act of discrimination, harassment, bullying or victimisation will be a breach of this policy and will be dealt with under the company's Disciplinary procedure.

### Reporting Incidents of Discrimination

Any employee that believes they have received less favourable treatment on any of the grounds listed in this policy, or if they feel that this policy has been breached in any way to their detriment, is encouraged to report this by using the company Grievance procedure to make a complaint.

The company will treat seriously and investigate urgently any complaint that it receives and will seek to resolve any grievance that it upholds. Employees will not be penalised for raising a grievance, even if the grievance is not upheld, unless the complaint is untrue or made in bad faith.

	
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