

## FOREMAN ROBERTS EQUALITY AND DIVERSITY POLICY

Foreman Roberts Consulting Limited is committed to the principles of equality/equal opportunities and diversity in the work place.

We operate in an environment where equality is upheld and discrimination of any kind (direct or indirect) is not tolerated. We support diversity amongst our workforce (whether full-time, part-time, temporary or a contractor/consultant), prospective employees and job applicants.

We will uphold all laws relevant to promoting equality and countering discrimination and are bound by The Equality Act 2010 and any amendments.

There should be no discrimination, harassment, bullying or victimisation on any grounds; including an individual's race, colour, nationality, ethnic origin, gender/gender reassignment, marital status/civil partnership, sex or sexual orientation, religion or belief, disability, physical characteristics, age or pregnancy/maternity/paternity. Everyone, whatever their characteristics, are encouraged to work together and will be respected, treated fairly, feel valued and be able to give their best. Everyone will be given equal opportunity to develop to their full potential and everyone should be recognised for their ability, efforts and contribution.

All employees are required to uphold these principles, and must be aware that any breach of this Policy is likely to result in disciplinary action (following investigation), up to and including dismissal. In some circumstances, an individual employee who breaches this Policy may also be personally liable at law for discriminatory action.

### **Direct Discrimination**

This includes, but is not limited to, decisions, comments or actions based on grounds such as:

- Refusal to employ someone
- Pay and benefits
- Training
- Promotion
- Dismissal and redundancy
- Denying employment opportunities
- Speaking in a discriminatory manner about someone
- Writing offensively about somebody
- Keeping offensive literature in the workplace
- Making racist or sexist jokes, or jokes about somebody's disability which creates a hostile environment
- Unfair or detrimental treatment of staff

### **Indirect Discrimination**

This may not be obvious at first sight. It occurs when a requirement or condition is applied which seems to have nothing to do with someone's race or gender, for example, but which, on closer examination, puts people of one gender or members of a particular racial group at a

disadvantage, unless it was a justified requirement of the business. Indirect sex discrimination could happen if, for example, it was stated that in order to be recruited, applicants must be 6ft tall or must have no childcare responsibilities. Clearly, proportionately fewer women than men would be able to comply with such criteria.

### **Harassment and Bullying**

Harassment is considered unlawful under the Equality Act 2010 for which the Company and individual may be liable at law. Harassment is conduct which is unwanted, unacceptable and humiliating and affects the dignity of the recipient. Harassment is related to a protected characteristic such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion and belief, sex and sexual orientation. Harassment can include bullying behaviour.

Harassment can be an isolated incident or persistent. This may occur either where the behaviour is aimed directly at the recipient, or where the conduct creates an intimidating, hostile, or humiliating work environment for the recipient and potentially others and can include behaviour that individuals find offensive even if it's not directed at them, and even if they do not have the relevant protected characteristic themselves.

Harassment of a person's disability includes harassment as a result of any alterations to their working conditions which are made in order to assist them.

Sexual harassment may amount to both an employment rights matter and a criminal matter, such as sexual assault allegations.

In addition, harassment under the Protection from Harassment Act 1997 - which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

Although bullying behaviour is similar to harassment, unlike harassment, bullying does not relate to a protected characteristic and is not considered unlawful under the Equality Act 2010. Bullying could take the form of offensive, abusive, malicious or intimidating behaviour or misuse of power with the intention of undermining, humiliating or belittling the person it is being directed towards (emotionally or physically).

Harassment and bullying may be obvious or insidious. They can happen face-to-face or by phone, post, e-mail, social media or any other form of 'communication'.

### **Victimisation**

Victimisation broadly refers to bad treatment directed towards someone who has made or is believed to have made or supported a complaint under the Equality Act. It includes situations where a complaint hasn't yet been made but someone is victimised because it's suspected they might make one.

If an individual gives false evidence or makes an allegation in bad faith, they are not then protected from victimisation under the Equality Act.

### **Disability Discrimination**

The Company is committed to providing Equal Opportunities to all employees and job applicants who have a disability, or have done in the past. This means that people will not be less favourably treated in recruitment, selection, training or any other aspect of employment as a result of disability, unless such treatment is justified within the meaning of the Disability Discrimination Act 1995. The Company will attempt to make reasonable adjustments to

accommodate disabled individuals where this is reasonably possible. We can however only make such adjustments if we are informed by an employee, or an applicant, of their disability.

A disability is any physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out their normal day-to-day activities. This includes, but is not limited to:

- Deficiencies in sight, smell and hearing
- Progressive conditions such as cancer, multiple sclerosis and muscular dystrophy
- Severe disfigurement such as scars and skin diseases
- Limb or postural deformities, including conditions, which require wheelchair use
- Special needs
- Mental illness

The Company understands that those people with a disability may wish for this to be considered confidentially. In these circumstances, they should raise it confidentially with a senior member of staff.

## **How does the Policy apply in Practice?**

### **Recruitment and Selection**

Job applicants must be given clear and accurate information about opportunities in the Company so they can assess their own suitability. The Company shall, as far as possible, ensure that any advertisements reach a wide variety of individuals of both sexes and people of different ethnic backgrounds.

### **Job Interviews**

The Company will try to ensure that all suitable candidates that apply for a job have a fair chance to describe or demonstrate their ability to do that job. Interviews will be thorough and conducted on an objective basis dealing only with the applicant's suitability for the job in hand.

Anyone suffering from a disability will be provided with any reasonable assistance which is necessary to enable them to attend interview. An individual can only be assisted in this way if the Company are made aware of the disability, and what assistance is required

### **Access to Opportunity**

Employees will be given equal access to appropriate opportunities, (such as training, development, promotion, etc.).

Every employee will receive a copy of this Policy at their induction, and will be requested to apply it throughout their working practices.

All those concerned with recruitment and management of employees, and their selection, training and development, will receive specific training in Equal Opportunities in the workplace if requested, in order to enable them to implement the Policy effectively.

### **What to do if discrimination is taking place**

All employees have the right to a working environment which is free of harassment, bullying or discrimination, either by word or by action, and where dignity and respect is shown by all to all. Any employee who experiences discrimination, harassment, bullying or victimisation should:

- First consider whether it is appropriate to make it clear to the person concerned that they find his or her behaviour offensive and ask them not to act in that way. It is recommended, a colleague or HR is asked to be present.
- If the situation persists, an affected employee should use the Grievance Procedure as soon as possible and ask their immediate manager (or, if appropriate, another line manager or HR) to investigate and resolve the complaint. The Grievance Procedure is on FRED (Company Intranet) under Company Procedures in Human Resources Policies.
- The HR Manager has special responsibility in this area. Whether or not you choose to use the Grievance Procedure, you are encouraged to contact the HR Manager for advice and assistance.

### **Our Customers, Suppliers, Sub-consultants, Visitors and our Local Community**

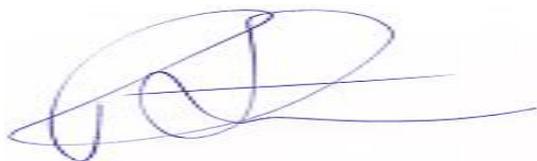
The same equal opportunity principles that the Company applies to employees and job applicants will also be applied to our suppliers, our customers, our sub-consultants, our visitors and our local community. It is the responsibility of everybody in the Company to ensure that customers, suppliers, sub-consultants and visitors are properly treated and that there is no unlawful discrimination against them on any basis.

We will work with anyone reporting discrimination, harassment, bullying, victimisation or any other conduct prohibited by the Equality Act 2010 and any amendments to eliminate such behaviour and put any identified measures in place to prevent such behaviour happening again.

These principles are essential and we must ensure that we apply them in all our dealings. Similarly, our employees are entitled not to be subjected to any detrimental treatment from customers, suppliers or visitors and if any problems occur in that area, they should immediately inform their manager.

We aim to create and maintain a strong company with excellent working relations where it is recognised that everybody is a valued member of the team; individual differences and the contributions of all are recognised and equality of opportunity is promoted.

This policy will be reviewed annually and updated more frequently if required.



Signed: Roy Steptoe CEO