



EQUAL OPPORTUNITIES

Statement of Policy

COLE Group recognises that we live in a society where discrimination still operates to the disadvantage of many groups in society. We believe that all persons should have equal rights to recognition of their human dignity, and to have equal opportunities to be educated, to work, receive services and to participate in society.

We are committed to the promotion of equal opportunities; through the way we manage the organisation and provide services to the community. In order to express this commitment, we develop, promote and maintain policies that will be conducive to the principles of fairness, inclusion and equality in the workplace.

The objective of this policy is that no person should suffer or experience less favourable treatment, discrimination or lack of opportunities on the grounds of gender, race, ethnic origin, disability, age, nationality, national origin, sexuality, religion or belief, marital status and social class.

How the policy will be implemented and who is responsible?

The Group Chief Executive has charged Managing Directors of business units within the Group with the implementation and monitoring of this policy. In order to implement this policy, we shall:

- ^^ Communicate the policy to employees, job applicants and relevant others.
- ^^ Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into role descriptions.
- ^^ Ensure that those who are involved in assessing candidates for recruitment or promotion will be trained in non discriminatory selection techniques.
- ^^ Incorporate equal opportunity notices into general communications practices.
- ^^ Ensure that adequate resources are made available to fulfil the objectives of the policy.

Conduct and general standards of behaviour

All employees are expected to conduct themselves in a professional and considerate manner at all times. We will not tolerate behaviour such as:

- ^^ making threats
- ^^ physical violence
- ^^ shouting
- ^^ swearing at others



- ^^ persistent rudeness
- ^^ isolating, ignoring or refusing to work with certain people
- ^^ telling offensive jokes or name calling
- ^^ displaying offensive material such as pornography or sexist / racist cartoons, or the distribution of such material via email / text message or any other format
- ^^ any other forms of harassment or victimisation

The items on the above list of unacceptable behaviours are considered to be disciplinary offences within COLE Group and can lead to disciplinary action being taken. We do, however, encourage our workforce to resolve misunderstandings and problems informally wherever possible, depending on the circumstances.

However, whether dealt with informally or formally, it is important for employees who may have caused offence to understand that it is no defence to say that they did not intend to do so, or to blame individuals for being oversensitive.

It is the impact of the behaviour, rather than the intent, that counts, and that should shape the solution found both to the immediate problem and to preventing further similar problems in the future.

Complaints of discrimination

We will treat seriously all complaints of unlawful discrimination on any forbidden grounds made by employees, trustees, clients or other third parties and will take action where appropriate.

All complaints will be investigated in accordance with the organisation's grievance, complaints or disciplinary procedure, as appropriate and the complainant will be informed of the outcome in line with these procedures.

We will also monitor the number and outcomes of complaints of discrimination made by employees, clients and other third parties.

C) Legal Obligations

Equal Opportunities and Discrimination (Equality Act 2010)



The new Equality Act came into force in October 2010 and replaces all previous equality legislation in England, Scotland and Wales – namely the Race Relations Act 1976, the Disability Discrimination Act 1995, the Sex Discrimination Act, the Equal Pay Act, the Employment Equality (Age) Regulations 2006, The Civil Partnership Act 2004, the Employment Equality Regulations 2003 (religions and belief and sexual orientation).

In valuing diversity, we are committed to go beyond the legal minimum regarding equality.

D) Recruitment and Selection

The recruitment and selection process is crucially important to any equal opportunities policy. We will endeavour through appropriate training to ensure that employees, making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.

- ^^ Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.
- ^^ We will ensure that role descriptions are in line with our equal opportunities policy. Job requirements will be reflected accurately in any personnel specifications.
- ^^ We will adopt a consistent, non-discriminatory approach to the advertising of vacancies.
- ^^ All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do their job.
- ^^ Short-listing and interviewing will be carried out by more than one person where possible.
- ^^ Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.
- ^^ Selection decisions will not be influenced by any perceived prejudices of other employees.

E) Monitoring

We will maintain and review the employment records of all employees in order to monitor the progress of this policy.

Monitoring may involve: -

- ^^ The collection and classification of information regarding the race in terms of ethnic/national origin and sex of all applications and current employees
- ^^ The examination by ethnic/national origin and sex of the distribution of employees and the success rate of the applicants; and



^^ Recording recruitment, training and promotional records of all employees, the decisions reached and the reason for those decisions.

^^ The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and employees.

Complaints Procedure

Current employment legislation is designed to prevent discrimination and identifies actions, which will be regarded as unlawful. Discrimination may be either direct or indirect and may include victimisation and/or harassment.

Any employee who believes that they are being discriminated against should be advised to raise the matter through the Grievance Procedure.

The following procedure briefly sets out the action to be taken by employees who wish to seek ways and means of rectifying a situation which to them appears incorrect or unfair. It is the intention of the Group that staff who have a grievance get the matter rectified, or are given an explanation as to why the circumstances exist, as soon as possible. Should employees have complaints they should, in the first instance, discuss the matter with their Manager. If the Manager cannot deal with the problem in the time limit stated below, they may request further time to consider the matter.

Stage	Employee to Contact	Time Limit for Response
One	Supervisor or Department Manager	Verbally or in writing within 3 working days
Two	Department Manager or Director	In writing within 5 working days
Three	Human Resources Director	In writing within 10 working days

Review

This policy shall be reviewed on an annual basis and as and when necessary to reflect the changes in relevant legislation.

Signed: 

Position: Managing Director

Date: 5th April 2019