

## Equal Opportunities and Diversity Policy Statement

1. SECOM PLC is an Equal Opportunities Employer. The objectives of the following policy are to ensure that the talents and resources of employees are utilized to the full and that no applicant or employee;

**EITHER** receives less favourable treatment on the grounds of gender, race, disability, colour, ethnic or national origin, marital status, sexuality, responsibility for dependants, religion, trade union activity and age.

**OR** is disadvantaged by conditions or requirements, which have a disproportionately adverse effect on his or her racial, national, colour, gender, marital status or age group,

**AND** which cannot be justified on grounds other than these reasons.

Equal opportunities and diversity cover all aspects of working life. The understanding and views of people on related issues are shown through their behaviour.

2. The Company will: -

2.1 Apply this policy positively and equally to all categories of staff.

2.2 Apply this policy to all selection procedures in order to ensure that individuals are treated for the purpose of selection, promotion and training on the basis of their relative merits and abilities in relation to the requirements of the post.

2.3 Encourage all employees within the company's service to progress within the organisation.

2.4 Take overall responsibility for and monitor this policy. On the Company's behalf the Managing Director is responsible for the implementation and monitoring of the policy. The detailed implementation will be delegated as appropriate to Departmental Heads with responsibility for staff.

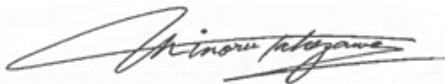
2.5 Require each member of the Company not to discriminate either directly or indirectly in the course of his/her duties and to incorporate this requirement into Company training syllabi.

3. This policy is based on the requirements of employment law. Any employee who fails to comply with the policy will be subject to the Company's disciplinary procedure and may be in breach of the law.

4. If at any time an employee considers that he or she has been treated unfavourably in terms of the criteria set out in Paragraph 1 above, the matter should be raised under the Company's grievance procedure.

5. SECOM ensure that adequate financial and physical resources are available to ensure that Company objectives are met.

6. This Policy is reviewed annually.



Signed:.....

Minoru Takezawa – Managing Director      January 2020

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	1 of 10

# Equal Opportunities and Diversity Policy

## Contents

- 1.0. Purpose**
- 2.0. Scope**
- 3.0. Definition of Discrimination**
- 4.0. Types of Discrimination**
- 5.0. Unlawful reasons for Discrimination**
- 6.0. Genuine Occupational Requirement (GOR)**
- 7.0. Reasonable Adjustments**
- 8.0. Third Party Harassment and Discrimination**
- 9.0. Procedure**
  - 9.1. Recruitment and Promotion
  - 9.2. Training and Development
  - 9.3. Complaints Procedure
  - 9.4. Informal Procedure
  - 9.5. Formal Procedure
  - 9.6. Outcome
- 10.0. Where to Find Other Information**
- 11.0. Related Policies**
- 12.0. Policy Owner**
- 13.0. Policy Review Date**

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	2 of 10

## 1.0. Purpose

The Company wholeheartedly supports the principles of equal opportunities in employment and is opposed to all forms of unfair discrimination and will treat all job applicants, employees, customers/clients, contractors and suppliers in the same way, regardless of their sex, trans-gender status, sexual orientation, age, race, nationality, ethnic or national origin, marital or civil partnership status, any particular religion, religious belief or philosophical belief, political stance, or disability that includes providing protection for people diagnosed with progressive conditions, such as HIV, MS and cancer.

This Equal Opportunities policy will apply in respect to all conditions of work including pay, hours of work, holiday entitlement, sick pay, maternity/paternity entitlement, pensions, recruitment, selection, training, promotion, shift work, redundancy and work allocation.

The responsibility for observing the law and operating this policy lies with the Managing Director, but the policy can only work effectively with the support and commitment of all colleagues.

The Company believes that everyone has the right to be treated fairly and with dignity and respect at work, and to work without fear of discrimination, bullying or harassment. The Company welcomes diversity amongst our staff, sub-contractors and visitors, recognising that all individuals from a wide range of backgrounds and experience can make contributions to achieving the Company's objectives.

The Managing will regularly review the Procedure below to ensure its continuing compliance with relevant employment legislation and to ensure the continuing success of the implementation of the Procedure by:

- Refraining from harassment and discrimination,
- Ensuring there are no suspected practices in breach of this Procedure,
- Ensuring that selection for promotion, training, work allocation etc. is carried out in a non-discriminatory manner,
- Promoting a harmonious working environment and eliminating discrimination and harassment.

## 2.0. Scope

All employees also have a responsibility for the application of good equal opportunities practices within the Company and for the avoidance of unfair treatment.

Specifically, managers are responsible for ensuring that fair treatment of all individuals is effected within their department and/or section, with particular reference to recruitment, selection, training and development opportunities and work allocation.

The Company will also obtain commitments from other persons or organisations such as consultants, subcontractors or agencies that they will also comply with this policy in their dealings with our Company and employees. (Please also see point 8 on Third Party Harassment and Discrimination).

This Policy does not form part of any employment contract and its contents are not to be regarded by any person as implied or expressed terms to any contract made by the Company.

The Company reserves the right to amend and update this Policy at any time.

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	3 of 10

### 3.0. Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

### 4.0. Types of Discrimination

4.1 **Direct Discrimination** - this occurs when a person or a policy intentionally treats a person less favourably, on the grounds of their colour, nationality, ethnic origin, gender, marital status, disability, religion, age, or sexual orientation.

4.2 **Indirect Discrimination** - is where the application of a policy, criterion or practice to a person which the employer would apply to others but which is such that:

- it is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents,
- the employer cannot justify the need for the application of the policy on a neutral basis,
- the person to whom the employer is applying it suffers detriment from the application of the policy.

4.3 **Associative Discrimination** – is discrimination against a person because they have an association with someone with a particular protected characteristic.

4.4 **Perceptive Discrimination** – is discrimination against a person because the discriminator thinks the person possesses that characteristic, even if they do not in fact do so.

4.5 **Harassment** - this occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Harassment can be regarded as behaviour that is offensive, frightening or in any way distressing and it is the impact on the individual that is important. It may be intentional bullying, which is obvious or violent, but it can also be unintentional or subtle and insidious.

4.6 Examples of behaviour that may constitute harassment or bullying include (but are not limited to):

- Physical conduct ranging from touching to assault, that includes unwelcome sexual advances
- Jokes, racist remarks, offensive/malicious gossip and/or rumours, threats, sectarian songs, whether written (which includes emails or text messages) or verbal
- Displays of graffiti/insignia, posters, flags, emblems or other material that is perceived to cause offence
- Coercion, including pressure for sexual favours or to participate in group activities
- Intrusion by pestering, following, spying, etc.
- Sexually suggestive pictures
- Non-verbal conduct of a sexual nature or relating to sexual orientation
- Professional or social exclusion (“sending to Coventry”)
- Unfounded threats relating to job security

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	4 of 10

- Calculated undermining of an employee's competence, for example through a consistently unreasonable or unfair workload or setting inappropriate tasks, setting impossible deadlines, unnecessary circulation of critical memoranda
- Physical or verbal threats or abuse, derogatory name-calling, ridicule, intimidation or insults
- Derogatory, or degrading comments
- Turning down reasonable requests for leave, etc.
- Inciting others to commit any of the above

Also see point 8, Third Party Harassment and Discrimination.

4.7 **Sexual Harassment** – is where any form of unwanted verbal, non-verbal or physical conduct of a sexual nature occurs. The importance of this is that no matter that another individual may not consider the conduct to be offensive it is the recipient's own response which is relevant. Therefore, all employees must be sensitive to the way in which words and actions are perceived by others.

4.8 **Victimisation** - occurs when a person is treated less favourably because they have brought, or intend to bring proceedings or they have given or intend to give evidence.

**5.0. Unlawful Reasons for Discrimination**

5.1. **Sex** – it is unlawful to treat a person less favourably on the grounds of sex, marital status, civil partnership, pregnancy or maternity, gender reassignment or transgender status. This applies to men, women and those undergoing or intending to undergo gender reassignment. Sexual harassment of men and women can be found to constitute sex discrimination. However, in the field of employment, a Genuine Occupational Requirement (GOQ) can be lawful if a person's sex is specifically required for a job. (see point 6).

5.2. **Age** - it is unlawful to treat a person less favourably because of their age (or perceived age). Thus direct or indirect discrimination, victimisation and harassment on the grounds of a person's age are all unlawful if they occur in the course of an individual's employment. Job applicants are also protected throughout the process of recruitment and selection.

This does not currently apply to redundancy payment calculations.

5.3. **Disability** - it is unlawful to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person.

5.4. The Disability Discrimination Act defines a disabled person as:

*“someone who has a physical or mental impairment that has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities”.*

5.5. The Act also sets out the following:

- substantial means neither minor nor trivial
- long term means that the effect of the impairment has lasted or is likely to last for at least 12 months (there are special rules covering recurring or fluctuating conditions)
- normal day-to-day activities include everyday things like eating, washing, walking and going shopping

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	5 of 10

- a normal day-to-day activity must affect one of the 'capacities' listed in the Act which include mobility, manual dexterity, speech, hearing, seeing and memory.
- 5.6. People who have had a disability in the past that meets this definition are also covered by the scope of the Act. There are additional provisions relating to people with progressive conditions, such as cancer and multiple sclerosis, but the condition is covered from the point of diagnosis rather than from the point when the condition has some adverse effect on their ability to carry out normal day-to-day activities.
- 5.7. The Company has a duty to make reasonable adjustments, please see point 7.
- 5.8. **Race, Colour, Nationality and Ethnic Origin** – it is unlawful to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.
- 5.9. **Sexual Orientation** – it is unlawful to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because they are homosexual, heterosexual or bisexual. It is also unacceptable to harass another person on the grounds of sexual orientation. Harassment is unwanted behaviour, which has the purpose or effect of violating another's dignity, and creates an intimidating, hostile, degrading, humiliating or offensive environment.
- 5.10. **Religion or Belief** – it is unlawful to treat a person less favourably because of their religious beliefs or their religion or their lack of any religion or belief. This includes victimisation or harassment of an employee because of their religion or similar beliefs. A Religion or Belief is defined as being any religion, religious belief or similar philosophical belief. This does not include any philosophical or political belief unless it is similar to religious belief.
- 5.11. **Part-time Workers** – a part-time worker is defined as someone who is 'not identifiable as a full-time worker'. A full-time worker is defined as someone who 'having regard to the custom and practice of the employer is identifiable as a full-time worker'. It is unlawful to treat part time employees less favourably than other workers in all aspects of employment. Part-time workers are entitled to be treated on the same basis and are entitled to the same benefits, pro-rata, as their full-time colleagues.
- 5.12. **Fixed Term Employees** - a 'Fixed-term employee' is defined as a person with a contract of employment, which is due to end when a specified date is reached, a specified event does or does not happen or a specified task has been completed. It is unlawful to treat a fixed term employee less favourably than other workers in all areas of employment when they are compared to a comparable permanent employee, unless objectively justifiable. Employers are not permitted to use this means of employment for more than 4 years.
- 5.13. **Equal Pay** - it is unlawful to discriminate between men and women and men and women should receive equal pay for work of equal value where work is the same or rated as equivalent regardless of the hours worked.
- 6.0. **Occupational Requirement (OR)** - in very limited circumstances it will be lawful for the Company to treat people differently if it is a genuine occupational requirement that the job holder must be of a particular religion, belief or sex. When deciding if this applies, the Company will consider the nature of the work and the context in which it is carried out.

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	6 of 10

## 7.0. Reasonable Adjustments

7.1. The Company has a duty to consider and make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- Making adjustments to premises
- Re-allocating some or all of a disabled employee's duties
- Transferring a disabled employee to a role better suited to their disability
- Relocating a disabled employee to a more suitable office
- Giving a disabled employee time off work for medical treatment or rehabilitation
- Providing training or mentoring for a disabled employee
- Supplying or modifying equipment, instruction and training manuals for disabled employees.

7.2. The Company will consider and make any other reasonable adjustment to the employment arrangements of its premises if they substantially disadvantage a disabled employee or a disabled applicant. However, a number of factors will be taken into account in deciding if it is reasonable for the Company to make any changes. In particular these include:

- How much an alteration will improve the situation for the disabled employee or applicant
- How easy it is to make the change
- The cost of the measure, both financially and in terms of the disruption it will cause
- The Company's resources
- Financial help, or other help, that may be available

If an employee has a disability, or becomes disabled during the course of their employment, and feels that any such adjustments could be made by the Company, they should contact their line manager.

## 8.0. Third Party Harassment and Discrimination

8.1. Third party harassment and discrimination refers to harassment and/or discrimination of an employee by any person who is not an employee of the Company. Third party harassers and discriminators may include:

- customers or clients of the Company
- suppliers of the Company; and
- independent contractors and consultants

8.2. Any employee who believes that they have been the victim of third party harassment and/or discrimination should immediately inform their manager of the incident.

8.3. Where an employee has been harassed and/or discriminated on more than one occasion, the Company will take such steps as are reasonably practicable to prevent any recurrence. For the purposes of third party harassment or discrimination, it is immaterial whether the third party harasser and/or discriminator is a different person in each instance of harassment and/or discrimination.

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	7 of 10

8.4. If an employee harasses and/or discriminates against a customer, client, supplier or an independent contractor or consultant the employee will be subject to disciplinary action.

## 9.0. Procedure

### 9.1. Recruitment and Promotion

- 9.1.1. The recruitment process must result in the selection of the most suitable person for the job whether this on a full time, part time, casual, temporary, seasonal or contract basis.
- 9.1.2. The Company will ensure that all job advertisements will encourage applications from all suitably qualified and experienced people, through either internal and/or external advertising.
- 9.1.3. All advertisements will be carefully worded to ensure that no intent of either direct or indirect discrimination is interpreted nor is there indication of stereotyping of roles.
- 9.1.4. All job descriptions for positions will include only requirements that are necessary and justifiable for the effective performance of the job.
- 9.1.5. Selection criteria and procedures are intended to ensure that individuals are selected, promoted and treated on the basis of their individual relevant merits, abilities and suitability for the post and membership of an under-represented group will not influence the appointment.
- 9.1.6. The selection process will be carried out consistently for all jobs at all levels within the Company and will be fair and non-discriminatory and all interviews will be undertaken with an unbiased approach towards candidates and only questions which relate to the job and which are non-discriminatory will be asked.
- 9.1.7. All information provided by applicants will be treated as confidential and if successful, their details will be stored and controlled in line with the requirements of the Data Protection Act 1998.

### 9.2. Training and Development

- 9.2.1. The Company is committed to ensuring equality of opportunity in terms of access to training in order to increase employees' knowledge and skills and to provide opportunities to develop their potential. It is the policy of The Company that it will not discriminate in the provision of training.
- 9.2.2. The Company will ensure that this is implemented through:
  - Continuous review and updating of training courses and literature,
  - Ensuring training materials are free from bias and do not discriminate, e.g. by showing minority groups or disabled people etc. in inferior roles,
  - Ensuring promotions and transfers criteria are justifiable,
  - Ensuring assessment criteria are clear and unbiased,
  - Ensuring staff conducting appraisal interviews, salary reviews and bonus reviews are aware of their obligations to carry this out fairly and consistently in line with this Procedure.
- 9.2.3. Appropriate training will be provided to enable staff to perform their jobs effectively.
- 9.2.4. The Company has a Training and Development Policy and/or there is a statement on training in every employee's written statement of terms and conditions of employment.

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	8 of 10

### 9.3. Complaints Procedure

9.3.1. Harassment, discrimination and bullying will not be tolerated. The Company recognises that making a complaint can be embarrassing and stressful. Sometimes the complainant simply wants the conduct or behaviour to stop and sometimes they want stronger action to be taken and therefore to take account of this the Procedure has various options of action that you can take.

If you think you are being harassed or discriminated against on any of the grounds contained in this Policy and wish to make a formal complaint you should follow the Company's Grievance Procedure that is in the Employee Handbook.

9.3.2. No judgements will be made about any complaints based on the course of action they choose to adopt.

9.3.3. Each complaint will be handled in strict confidence and with impartiality and will be promptly and thoroughly investigated. As any complaint of this nature will be regarded as serious it may be that the offender will be suspended whilst the offence is being investigated.

9.3.4. However, you may wish to consider the following two options before you take the third option of making a formal complaint.

### 9.4. Informal Procedure

9.4.1. It is usually best to try and sort things out quickly and as close to the problems as possible. Therefore, you can try to resolve an issue of harassment or discrimination informally by approaching the person directly. It is a good idea to make it clear to the person who is harassing you that their behaviour is unwelcome and that you want it to stop.

If you do not want to do this, particularly if you are feeling bullied or intimidated or if the person in question has failed to stop the problem, or if you would find it too embarrassing, then you can speak with your manager. As a result of the advice you may then feel able to approach the person direct, or you may be willing to do so with support.

9.4.2. If you do choose to address your concerns to the person be clear and assertive but take care that you are not perceived to be bullying the individual. You may find it helpful to ask a colleague or Trade Union Representative to be with you in a support role.

9.4.3. You could also put your issue in writing to the harasser.

9.4.4. If you do not wish to deal with this informally, or if informal steps have failed to resolve the problem, you can raise the matter in line with the Formal Procedure below.

### 9.5. Formal Procedure

9.5.1. To make a formal complaint you should follow the Company's Grievance Procedure that is in the Employee Handbook that also outlines the process that will be taken.

9.5.2. The formal grievance should be detailed in writing and submitted to the designated person responsible for managing such grievances without unreasonable delay.

9.5.3. The grievance should contain the reasons for your action and all relevant facts surrounding the matter, including relevant dates, names and witnesses. You should also indicate what

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	9 of 10

you feel the Company should do and any other suggestions or information that you believe will assist in resolving the issue.

9.5.4. In all circumstances a full investigation will be undertaken to establish the facts and decide upon the appropriate course of action.

9.5.5. The Company will treat any complaint received under this Policy confidentially.

#### 9.6. Outcome

9.6.1. Any employee, who harasses, bullies, victimises or discriminates against any other employee, third party, client, sub-contractor or member of the public on the grounds contained in this Policy will be subject to the Company's Disciplinary Procedure. In serious cases, such behaviour, if confirmed, will be deemed to constitute Gross Misconduct and as such may result in Summary Dismissal.

9.6.2. If any employee raises a complaint, that upon investigation, is proven to be deliberately malicious, then that employee will become the subject of disciplinary action. Any employee to be in breach of this Procedure will be the subject of disciplinary action, which may lead to dismissal.

#### 10.0. **Where to find further information**

If you require further information on this policy or procedure then please speak with your Manager in the first instance.

#### 11.0. **Related Policies**

- Dignity and Respect Policy
- Disciplinary Policy
- Grievance Policy
- Training and Development Policy
- The above list is not exhaustive and other Company policies may be applicable

#### 12.0. **Policy Owner**

This Policy is owned and maintained by the Managing Director.

#### 13.0. **Policy Review**

This Policy is reviewed annually.

Document Number	Version	Version Date	Classification	Page Details
PO010	2	02/01/2020	Public	10 of 10