

### 1.0 Introduction

The Company recognises that discrimination is not only unacceptable, it is also unlawful. The Company's aim is to ensure that no job applicant or employee is discriminated against, directly or indirectly, on any unlawful grounds.

#### 2.0 Discrimination

The law on discrimination is particularly complex. Briefly, it is unlawful to discriminate against a person on the following grounds: sex or the fact that an individual is married; race, ethnic or national origins; sexual orientation; religion or belief; disability or age.

Discrimination can take many forms:

- <u>Direct Discrimination</u> occurs where someone is treated less favourably from others in the same circumstances due to a particular characteristic. An example would be a refusal to appoint someone to a particular post simply because of his or her sexual orientation.
- Indirect Discrimination it is also unlawful to discriminate indirectly against anyone. That means applying a provision, criteria or practice which, although applied equally to everyone, is such that a considerably smaller proportion of a particular group cannot comply with it and which cannot be justified. An example would be making a rule about dress or uniform which would disadvantage those from certain racial or ethnic groups and for which there was no justification.
- Harassment subjecting someone to harassment can amount to discrimination.
  Harassment is unwanted conduct that violates a person's dignity or creates an
  intimidating, hostile, degrading, humiliating or offensive environment having regard to
  all the circumstances and the perception of the victim.
- <u>Victimisation</u> occurs where an individual is treated less favourably than colleagues because he/she has taken action to assert their legal rights or have assisted a colleague in that regard.
- <u>Disability Discrimination</u> occurs if a disabled person is treated less favourably by their employer (or potential employer) because of a reason relating to their disability, without a justified reason. In addition, employers are required to make reasonable adjustments to working conditions or the workplace where that would help to accommodate a less able person.

### 3.0 Implementing Equality of Opportunity

Goldcrest Cleaning Limited will apply equal opportunities requirements throughout all of its employment practices, and will ensure equal opportunism through the following measures:

Recruitment and Selection



- Recruitment and employment decisions will be made based on fair and objective criteria and in accordance with Goldcrest Cleaning Limited's Recruitment Policy.
- Goldcrest Cleaning Limited will ensure that the local community is encouraged to apply for jobs by circulating those vacancies through local press and Job Centre Plus.
- If a particular group is under represented, Goldcrest Cleaning Limited may consider positive action to redress imbalance.
- Goldcrest Cleaning Limited is committed to working with the long time unemployed.
- All vacancy advertisements will include an appropriate short statement on equal opportunity.
- Person and job specifications will be limited to those requirements, which are necessary for the effective performance of the job.
- All Goldcrest Cleaning Limited personnel who participate in recruitment and selection will receive training in this area.

## <u>Training and Development</u>

- Goldcrest Cleaning Limited will reflect the commitment to equal opportunities through equality of access to training and career development opportunities.
- Training programmes will be designed to support the aims of this Policy. Care will be taken to ensure that all training materials do not stereotype, prejudice or discriminate in any way. Every effort will be made to translate all written training materials where necessary.
- Training opportunities will be based upon a member of staffs' ability, business needs, and the availability of appropriate work-related courses.
- All new staff will receive induction training. As part of the induction process staff will be made aware of this policy and what it means for them. Existing staff will receive refresher training on this Policy and other training as appropriate.

### Adapting Working Practices

 Goldcrest Cleaning Limited is committed to recognizing cross cultural differences and to this end Goldcrest Cleaning Limited will respect an individual's needs regarding the observance of their faith such as specific prayer times. Requests for annual leave to attend religious festivals will be respected and accommodated as far as is practical within the particular working environment.

### Review of Practices, Policies and Procedures

• From time to time Goldcrest Cleaning Limited reviews all its employment practices, policies and procedures to identify and remove any barriers to equal opportunities.

### Discipline & Grievance

 Any person(s) who feel that they have been treated less favourably than others in the same circumstances must report it to their Supervisor, Area Manager or Senior Area Manager.



- All staff have the right to work in an environment which is free from any form of harassment. Harassment at work in any form is unacceptable behavior and will not be permitted or condoned.
- Discriminatory behavior on any grounds or any breach of this policy will not be tolerated and may result in disciplinary action up to and including dismissal in accordance with Goldcrest Cleaning Limited's Disciplinary Policy as detailed in Section 28 of the Goldcrest Cleaning Limited Employee Handbook.
- Goldcrest Cleaning Limited will maintain confidential records of complaints covered by the scope of this policy and any investigation undertaken.

## 4.0 Employee advice and support

For third party advice and support, employees should contact one of the organisations listed below:

- Equality and Human Rights Commission
- Citizens Advice Bureau
- Community Legal Services Direct

## **5.0 Specific Arrangements**

### Age

Redundancy payments (and the calculation thereof) are exempt from this policy.

### Disability

In order to give disabled persons as much access to services as those who are not disabled, and in order to ensure they have equal opportunities for employment, training and promotion, reasonable adjustments will be made in the following areas:

### premises;

- the employee's duties;
- the employee's role;
- the employee's working location;
- availability and flexibility of time off work for medical treatment or rehabilitation;
- training, mentoring and development; and
- availability of suitable equipment and training.

## 6.0 Responsibilities

Goldcrest Cleaning Limited will monitor the effectiveness of its Equal Opportunities Policy.

The overall responsibility for the effective implementation of the policy, rests with the Managing Director. However, Senior Management and Employees have a responsibility for ensuring that equality is integrated, implemented and monitored within their own service areas.

All senior management are trained via our outside consultants on how the employment law impacts on the process of recruitment and selection

All employees must co-operate with Site Supervisors and Area Managers in the implementation of this policy. It is the company policy to provide all employees with suitable and sufficient information, instruction and training. Management will ensure that all employees undertake a thorough induction



course on the first day of employment that will include equal opportunity issues. Regular meetings/toolbox talks will ensure employees are updated on any changes.

Individual employees can be held liable for discriminatory practice by an employment tribunal. This can also result in them being responsible for the payment of compensation.

Breaches of this policy should be reported to Christine O'Callaghan, Senior Area Manager.

Breaches of this policy by employees will be dealt with in accordance with the company's Disciplinary and Grievance procedure as detailed in Section 28 of the Goldcrest Cleaning Limited Employee Handbook.

Goldcrest Cleaning Limited will, where possible, ensure that all sub-contractors and other agents act in accordance with this policy, but accepts no responsibility for their actions in regard to this policy.

With the assistance of feedback from our employees, other agencies and service users, Goldcrest Cleaning Limited will annually monitor, review and evaluate the effectiveness of its employment and service policies and its equality programmes.

#### 7.0 Authorisation

The authority for this policy is vested in the Managing Director.

Alan Jones Manging Director

**Document Control** 

A hard copy of this policy is kept at Head Office.