



## 1.0 Purpose

The purpose of the Diversity and Equal Opportunities Policy is to encourage an atmosphere where all staff embrace the benefits of working in a diverse community and to provide a framework for the fair and equitable treatment of all employees, job applicants, customers, suppliers and visitors irrespective of their individual differences or any personal characteristics.

This policy relates to all aspects of employment, including individual standards of behaviour, the advertisement of jobs, recruitment and selection, training and development, appraisal, pay, promotion and leaving the Company. The principles apply equally to all dealings with customers, suppliers and visitors.

This policy applies to anyone on a WYG site and the sanctions will apply directly to all WYG employees.

## 2.0 Policy Statement

We are committed to the principle of valuing diversity. We recognise the benefits that can be secured through employing a diverse workforce and harnessing the individual talents of staff from different backgrounds and with different skills. These include:

- Tangible business benefits such as improved staff morale, absence levels, staff retention, customer satisfaction and profits.
- An improved Company image leading to a wider customer base and a wider pool of people to recruit from.
- The avoidance of costly legal proceedings caused by breaches of equality legislation.

We are committed to providing fair and equal treatment for all staff (including self employed and staff contract workers), customers, suppliers and visitors and all staff are expected to treat everyone with whom they come into contact with dignity and respect. You should be aware of the importance the Company attaches to this policy and that breaches will be classed as disciplinary offences and dealt with accordingly.

**Definitions** - See Appendix A.

**Legal Background** - The relevant UK legislation affecting diversity and equal opportunities is listed in Appendix B.

## 3.0 What are our various responsibilities?

### You must

- Have read and understood the Diversity and Equal Opportunities Policy and contacted your manager or HR if you have any questions
- Treat all other employees and third parties with dignity and respect
- Challenge inappropriate behaviour



## Managers must

- Implement this policy and ensure it is understood and complied with by staff in their area
- Deal with breaches and complaints (whether reported or not) seriously, speedily, sensitively and confidentially
- Contribute ideas for the advancement of diversity principles within the organisation
- Set a high personal example.

## HR must

- Review and monitor the effectiveness of this policy by providing advice and encouraging the adoption of its principles throughout the organisation
- Ensure complaints are adequately investigated.

## 4.0 Implementing this Policy

All staff will have access to the policy and it will be explained in inductions.

To show you how the policy impacts on your everyday working life, please see the examples below. Obviously, the lists are not exhaustive and each situation must be considered on its merits.

## 5.0 General Standards of Behaviour

We expect you to conduct yourself in a professional and considerate manner at all times. We will not tolerate behaviour such as:

- Physical violence
- Shouting or swearing
- Rudeness
- Isolating, ignoring or refusing to work with certain people
- Telling offensive jokes or name calling
- The display of offensive material such as pornography or sexist/racist cartoons
- Lewd gestures or remarks

It is no defence to say you did not intend your behaviour to cause offence as it is for the person on the receiving end of the behaviour to decide what they consider to be offensive. It is the impact of the behaviour rather than the intent which is important.

## 6.0 Recruitment and Selection

If you are involved in the recruitment and selection of staff you must ensure that:

- A carefully worded and objective job specification/description is produced for all vacancies, outlining essential skills, knowledge and competence required.
- Any skill test or psychometric test must be appropriately validated, free from unlawful bias and be administered by a properly qualified person.
- Applications from all sections of the community will be encouraged.
- Short-listing and selection will be based on objective criteria relevant to the job and decisions made by suitably trained staff, purely on the basis of merit. The reasons for all decisions will be recorded so that they can be monitored and analysed.



- Job applicants will be encouraged to complete the “Equal Opportunities Monitoring Form” which is completed at the point of interview and posted directly to the HR Service Centre.

## 7.0 Training, Development and Promotion

We will ensure that irrespective of any personal characteristics:

- The training necessary to implement this diversity policy is provided.
- All employees are encouraged to achieve their full potential.
- Selection for all training, career development opportunities and job moves will be purely on the basis of merit.
- Appraisals of performance will be conducted objectively.
- Selection for promotion will be purely on the basis of merit.

## 8.0 Complaints

If you feel this policy has been breached you should try to speak to your manager in the first instance who will ensure all issues are investigated and dealt with appropriately.

Formal complaints about breaches of this policy can be made using the Company's grievance procedure, and complaints should be made via managers or the Human Resources Department as appropriate.

## 9.0 Discipline

If you unlawfully discriminate, harass or victimise another staff member on the grounds of sex, gender reassignment, marital status, race, ethnic origin, religion or belief, sexual orientation, age or disability you may be subject to action under the Company's Disciplinary Procedure in the absence of mitigating factors. Serious acts of discrimination, harassment or victimisation are deemed gross misconduct and may result in summary dismissal.

## 10.0 Monitoring and Review

We will monitor this policy periodically to judge its effectiveness and will update it in accordance with changes in the law. In particular, we will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups. If changes are shown to be required as a result of this monitoring, we will implement them.

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 the Data Protection Act 1998.



## Appendices

### Appendix A – Definitions

It is important to understand the difference between the concepts of equality and diversity.

- Equality (or equal opportunities) is about protecting certain groups of staff against unfair treatment based on a particular personal characteristic. This protection is normally based on those groups covered by legislation, i.e. sex, gender reassignment, marital status, race, ethnic origin, religion or belief, sexual orientation, age or disability.
- Diversity is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills, and experiences, and encouraging and using those differences to create a productive and effective workforce. There is no definitive list of what these differences are but a selection is contained in Appendix 3.

#### **Age**

Age is a protected characteristic under the Equality Act 2010 and protects workers, young and old, from discrimination on the grounds of their age.

#### **Associative Discrimination**

This is direct discrimination where someone is treated less favourably because they associate with another person who possesses a protected characteristic under the Equality Act 2010. The person treated less favourably does not need to possess one of the protected characteristics.

#### **Direct Discrimination**

Direct discrimination is where someone is treated less favourably because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic

#### **Disability**

Under the Act a person is disabled if they have a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities.

#### **Gender**

The word 'gender' is often used in place of the word 'sex' in equality issues. 'Gender' does not appear in legislation (except for 'gender reassignment' – see below) but 'sex discrimination' and 'gender discrimination' are generally interchangeable.

#### **Gender Reassignment**

Gender reassignment is a process undertaken for the purpose of changing a person's sex by changing physiological or other characteristics of gender.

#### **Harassment**

This is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. It can consist of verbal abuse, racist jokes, insensitive comments, leering, unwanted/unacceptable physical contact, unwanted sexual advances, ridicule or Isolation.



## **Indirect Discrimination**

This occurs where a condition, rule, policy or practice that applies to everyone but disadvantages people who share a protected characteristic. An example of indirect sex discrimination could be requiring everyone to work full time since requiring everyone to work full time will potentially adversely affect a higher proportion of women than men.

## **Perceived Discrimination**

This is direct discrimination where someone is treated less favourably because they are perceived to have a particular protected characteristic. So it still applies even if that person does not have the said characteristic.

## **Protected Characteristic**

This is the collective name for the groups protected by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

## **Sexual Orientation**

This is determined by whether a person is attracted to people of their own sex, the opposite sex or both sexes. Law also covers assumptions and perceptions of a person's sexuality.

## **Transsexual**

Under the Equality Act 2010 a transsexual person is someone who proposes to, starts or has completed a process to change their gender. The Act does not require a person to be under medical supervision in order to gain protection.

## **Victimisation**

If a person has made or is making an accusation of discrimination in good faith under the Equality Act, it is unlawful to discriminate against them for having done so, or because they intend to do so or it is suspected that they intend to do so.

## **Appendix B – Legal Background**

The relevant UK legislation affecting diversity and equal opportunities is contained in the following and any subsequent amendments:

- Equality Act 2010
- Equal Pay Act 1970
- Employment Rights Act 1996
- Employment Relations Act 1999
- Rehabilitation of Offenders Act 1974
- Protection from Harassment Act 1997
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Trade Union and Labour Relations (Consolidation) Act 1992



## Appendix C – Examples of Individual Differences

Diversity is about recognising, valuing and using the differences which people have. There is no definitive list of what these differences are, but some examples are shown in the following table:

<b>Social Category</b>	<b>Informational</b>	<b>Values Based</b>
Gender	Previous jobs	Personality
Race	Career length	Politics
Disability	Upbringing	Learning style
Religion or belief	Education	
Sexual orientation	Qualifications	
Age	Outside interests	
Marital status	Trade Union activity	
Caring responsibilities	Current employment status	
Working pattern		
Culture		
Nationality		
Colour		
Language		
Accent		
Weight		
Height		
Appearance		
Social class		
Health		