

1. POLICY

- 1.1 BCM is committed to providing an environment free from discrimination, bullying, harassment or victimisation, and where all employees are treated with respect and dignity. We aim to create a culture of diversity where all employees are valued for their contribution and individuality, and where everyone has an equal chance to succeed.
- 1.2 We are committed to providing equality of opportunity for all, irrespective of:
 - Age
 - Disability
 - Ethnicity (including race, colour and nationality)
 - Gender (including gender reassignment)
 - Martial status, pregnancy or maternity)
 - Sexual orientation (including civil partnership status)
 - Religion, belief

2. SCOPE

- 2.1 This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, home workers, part-time and fixed-term employees, casual workers and agency staff (collectively referred to as **staff** in this policy).
- 2.2 We all have a responsibility to embrace and support this vision and we must continue to challenge behaviour and attitudes that prevent us from achieving this.
- 2.3 All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass any member(s) of staff.
- 2.4 This policy does not form part of any employee's contract of employment and may be amended at any time.

3. AIM

- 3.1 We aim is to promote equality of opportunity for all, through:
 - a) complying with our legal obligations
 - b) ensuring that managers and staff undergo appropriate equality training for their role
 - c) promoting equality and diversity through recruitment & selection
 - d) ensuring that all contractors and third parties are aware of this policy and abide by it
 - e) involving staff in the development and delivery of our equality objectives

4. RESPONSIBILITIES

- 4.1 The board of directors has overall responsibility of this policy and ensuring compliance with discrimination law
- 4.2 Human Resources has operational responsibility for this policy, including its regular review.

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- 4.3 All managers have responsibility for setting an appropriate standard of behaviour, leading by example and ensuring that subordinates adhere to the policy and promote our aims and objectives with regard to equal opportunities.
- 4.4 Human resources have responsibility for ensuring managers receive appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.
- 4.5 Managers and those involved in recruitment that have any questions about the content or application of this policy should contact HR to request training or further information.

5. ASSOCIATED POLICIES

- 5.1 The following documents are associated with this policy
 - BPOL-02 Anti Harassment and Bullying Policy
 - BPOL-10 Flexible Working Policy
 - BPOL-07 Disciplinary Policy
 - BPOL-11 Grievance Policy

6. FORMS OF DISCRIMINATION

- 6.1 Discrimination by or against staff is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.
- 6.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.
- 6.3 Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.
- 6.4 Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- 6.5 Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported someone else's complaint.

7. RECRUITMENT AND SELECTION

- 7.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants should be done by more than one person wherever possible.

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- 7.2 Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. They should include an appropriate short policy statement on equal opportunities and a copy of this policy shall be sent on request to those who enquire about vacancies.
- 7.3 We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our Company. Where appropriate, we may approve the use of lawful exemptions to recruit someone with a particular protected characteristic - for example, where the job can only be done by a woman. The advertisement should specify the exemption that applies.
- 7.4 Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the HR Manager. For example:
 - a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
 - b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
 - c) Positive action to recruit disabled persons.
 - d) Equal opportunities monitoring (which will not form part of the decision-making process).
- 7.5 Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment.
- 7.6 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective staff must be able to produce original documents such as a passport before employment starts, to satisfy current immigration legislation.
- 7.7 To identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us to take appropriate steps to avoid discrimination and improve equality and diversity.

8. STAFF TRAINING AND PROMOTION AND CONDITIONS OF SERVICE

- 8.1 Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the Company and all promotion decisions will be made on the basis of merit.
- 8.2 Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.
- 8.3 Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to

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all staff that should have access to them and that there are no unlawful obstacles to accessing them.

9. TERMINATION OF EMPLOYMENT

- 9.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- 9.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

10. DISABILITY DISCRIMINATION

- 10.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.
- 10.2 If you experience difficulties at work because of your disability, you may wish to contact HR to discuss any reasonable adjustments that would help overcome or minimise the difficulty.
- 10.3 HR may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.
- 10.4 We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

11. TEMPORARY AND AGENT WORKERS

- 11.1 We monitor our use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

12. PART TIME WORK

- 12.1 We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately under our Flexible Working Policy

13. BREACHES OF THIS POLICY

- 13.1 BCM take cases of harassment, discrimination, bullying or victimisation very seriously. The following steps should be taken if you believe that you may have been discriminated against or harassed:
 - a) Discrimination - you are encouraged to raise the matter through our Grievance Procedure.
 - b) Harassment - you are encouraged to raise the matter through our Anti-harassment and Bullying Policy.
- 13.2 If you are uncertain which applies or you need advice, please contact your line manager or HR.

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- 13.3 Allegations regarding potential breaches of this policy will be treated in confidence and investigated promptly and fairly in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result.
- 13.4 Employees who make false allegations which are found to have been made in bad faith will be dealt with under our Disciplinary Procedure.
- 13.5 Any employee who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We reserve our right to terminate our contractual relationship with other members of staff if they breach this policy.

14. MONITORING AND REVIEW OF THE POLICY

- 14.1 Employees are invited to comment on this policy and suggest ways in which it might be improved by contacting HR.
- 14.2 Any improvements identified will be recommended to the board and made as soon as possible.

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