



Policy Statement

Blara Group recognizes that discrimination and victimization is unacceptable and that it is in the interests of the Company and its employees to utilize the skills of the total workforce. It is the aim of the Group to ensure that no employee, worker or job applicant receives less favorable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics).

Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.

We oppose all forms of unlawful and unfair discrimination or victimization. To that end the purpose of this policy is to provide equality and fairness for all in our employment.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilized to maximize the efficiency of the organization.

Our staff, subcontractors and suppliers will not discriminate directly or indirectly, or harass workers, customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision or supply of goods and services.

This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

SIGNED: _____

DATE 05 / 01 / 2020

Walter Martin (Managing Director at Blara Group)

REVIEW DATE: _____ **January 2021**



Purpose

The Group is committed to promoting equality and diversity, by providing an inclusive and supportive working environment for all employees, service users and service providers.

The aim of this policy is to ensure that the Group complies with equal opportunities legislation, creating a climate of equal treatment that provides opportunities for employees and which ensures that the talents and resources of the workforce are fully utilised and valued to maximise the efficiency of the organisation.

This policy is designed to help all employees develop to their full potential and to ensure that the talents and resources of the workforce are fully utilised to maximise the efficiency of the company. This means that all the Group's employees will be given the same opportunities in recruitment, training and promotion, regardless of the following (protected characteristics):

- **age**
- **race**
- **gender / gender reassignment**
- **disability**
- **religion or religious belief**
- **marriage / civil partnership**
- **pregnancy / maternity**
- **sex or sexual orientation**

When employees experience discrimination (or witnesses a breach of the Equal Opportunities Policy), it is essential that they report it to their line manager as soon as possible. There are separate procedures for cases where:

- A member of staff has grounds for alleging that another member of staff is guilty of abusing (physically, sexually or mentally) a customer or employee.
- A service user or customer is offensive towards a member of staff

1. Policy

- 1.1 Employees rightly expect to be treated fairly and considerately and this expectation is generally supported by the law. All employees are expected to abide by the requirements of legislation and this policy by:
- 1.2 Not treating any employees/service users/customers less favourably based on any of the protected characteristics
- 1.3 Not expecting an employee/service user/customer solely on the grounds of them falling within any of the protected characteristics to comply with requirements for any reason whatsoever related to their employment, which are different from the requirements for others;
- 1.4 Not imposing requirements or conditions on an employee/service user/customer, which are, in effect, more onerous on that individual than they are on others. For example, this would include applying a condition (which is not warranted by the requirements of the position) which makes it more difficult for members of a particular race, age or sex to comply than others not of that race, age or sex.
- 1.5 Not treating an employee/service user/customer less favourably than others are, or would be treated in the same or similar circumstances, because they have made a complaint or allegation



discrimination or have acted as a witness or informant in connection with proceedings any Discrimination Act.

- 1.6 Not making unwanted approaches that include unwelcome physical, verbal or non-verbal contact affecting the dignity or women and men at work or any third party.
- 1.7 Not persistently criticising, abusing or ridiculing, either in public or private, an employee/service user/customer, which humiliates and demeans the individuals involved, gradually eroding their self-confidence and self-respect
- 1.8 The Group recognises the right of an employee to belong to, or not to belong to a Trade Union, and membership or non-membership of such an union will not be taken into account in any way during the career of the employee.
- 1.9 The Group will ensure that managers understand their role with regard to managing diversity, and how this inter-links with other quality initiatives. It is the responsibility of all managers and supervisors to implement monitor and actively promote this policy, including coaching and advising staff on good practice and legal implications.
- 1.10 Individual employees are responsible for challenging discriminatory practices (even when behaviour is not directed at them personally), and for raising breaches of this policy with their immediate manager.
- 1.11 Since discrimination in its many forms is against the Group's policy, any employee offending will be dealt with under the Disciplinary Policy.

2. Religious holidays

- 2.1 The Group respects an individual's right to hold and practice their religious beliefs, as long as these beliefs do not infringe upon the rights of service users or others.
- 2.2 The managers' primary concern must be to adequately cover the needs of the service. However, managers will be expected to demonstrate that they have made every attempt to be flexible where leave for a religious holiday has been requested. Such leave can be taken as annual leave or as unpaid leave.

3. Fairness in recruitment.

- 3.1 No vacancy should be advertised or publicised (internally or externally) in a way that discourages applications from any individual, group or sector of the population, unless there is a genuine and justifiable require for the post.
- 3.2 All applications will be considered on merit. Each individual will be assessed so far as practicable against a set of objective, non-discriminatory criteria that will be directly related to the demands of the particular vacancy.
- 3.3 All advertisements, application forms and other recruitment material should clearly state that the Group is committed to equal opportunities where possible.
- 3.4 All interviews should be conducted in accordance with the terms and spirit of this policy. The interview questions will be closely related to the selection criteria and will be asked in order to elicit information that will give a fair assessment of that particular applicant's ability to perform the tasks required by the vacancy.
- 3.5 The Group will, where appropriate, make reasonable adjustments to its arrangements for



interviews and conditions of employment in order to ensure the applicants with disabilities are not disadvantaged.

4. Commitments and Responsibilities to Equal Opportunity and Diversity

4.1 Group's Commitment

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- To promote equality in the workplace which we believe is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management and has been agreed with trade unions and/or employee representatives.
- The policy will be monitored and reviewed annually
- To ensure the Group's subcontractors and suppliers have effective equal opportunities and diversity policies and practices.

4.2 Responsibilities of management

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Group, however, Directors / Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each manager / Director will ensure that:

- all their staff are aware of the policy and the arrangements, and the reasons for the policy;
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
- proper records are maintained.

Human Resources will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic departmental audits.

4.3 Responsibilities of staff

Responsibility for ensuring that there is no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- comply with the policy and arrangements;
- not discriminate in their day to day activities or induce others to do so;
- not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- inform their manager if they become aware of any discriminatory practice.



4.4 Third Parties

Third-party harassment occurs where a Group employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. The Group will not tolerate such actions against its staff, and the employee concerned should inform their manager / supervisor at once this has occurred. The Group will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

5. Promotion

5.1 Vacancies will, if practicable, be filled after internal advertising.

5.2 Assessment of internal applicants should be made objectively and without bias by using the selection criteria related to the demands of the vacancy.

6. Training

6.1 Employees involved in recruitment and the management or supervision of others should receive initial and ongoing training to help them understand and comply with the law and our policy.

6.2 All employees will have equal access to training. Specific and/or additional training may be made available for employees with disabilities as a part of the companies' reasonable adjustments.

7. Employment of people with disabilities

7.1 The Group is committed to positively ensuring people with disabilities are afforded equal opportunities to enter employment and develop their potential with the organisation.

7.2 The Group will encourage applications from disabled people by ensuring all applicants with a disability who meet the essential criteria for a job vacancy are interviewed and considered on the basis of their abilities and by considering any reasonable adjustments which will help the employee to effectively carry out their role.

7.3 Managers will take all reasonable steps to ensure that the working environment does not prevent people with disabilities from taking up positions for which they are suitably qualified. Where special steps need to be taken to ensure health and safety, the Health and Safety Officers and the members of HR will brief members of the department concerned.

7.4 If employees of the Group become unable to carry out their normal duties because of disability in the course of their employment, the Group will take all reasonable steps to make sure they maintain or return to the roles appropriate to their experience and abilities. Consideration will be given to reasonable adjustments to the job and working conditions, redeployment and retraining, enabling them to remain with the Society whenever possible.

8. Equal treatment of part-time workers

8.1 The Group is committed to providing equal opportunities in recruitment, employment, training and promotion for all part-time workers.

8.2 It is necessary to ensure that part-time employees are not treated less favourably than their full-time equivalents in respect of the following entitlements:



- the hourly rate of pay
- access to the companies pension schemes
- annual leave

8.3 Previous or current part-time status should not of itself constitute a barrier to access to training or promotion to a post, whether the post is full-time or part-time.

8.4 With regards to maternity, paternity and parental leave, part-time workers should not be treated less favourably than their full-time equivalents in terms of:

- calculating the rate of maternity pay
- the length of service required to qualify for payment
- the length of time for which the payment is received

For more information please refer to the Family Friendly Policies or contact Human Resources department.

8.5 When selecting for redundancy part-time workers must not be treated less favourably than comparable full-time workers.

8.6 The Group will always give a due consideration to all requests to change to part-time working or job-sharing, and where possible explore with the staff how this change could be accommodated.

9. Equal treatment of fixed-term workers

9.1 It is the Group's policy to provide equal treatment to all employees on fixed-term contracts in respect of overall employment package and general working conditions. Fixed-term employees might be excluded from specific benefits only when it is objectively justified.

9.2 The Group will ensure that all fixed-term employees are informed of permanent vacancies on the same basis as permanent staff by the usual practice of displaying the vacancy on the company website and intranet (pending approval).

10. Age diversity at work

10.1 The Group committed to employing all people of working age in line with the Employment Equality (Age) Regulations 2006. Age related criteria or age ranges will not be used in company advertisements.

10.2 Training and development opportunities will be open to all employees as not only is unlawful to disregard employees of a particular age, but this practice wastes talent of employees hinders productivity.

10.3 Job evaluation, reward and promotion always reflect the value of individual contributions and standards of job performance and are not based on age-related criteria.

11 Equality Training

11.1 A series of regular briefing sessions will be held for staff on equality issues. These will be repeated as necessary. Equality information is also included in induction programmes.



11.2 Training will be provided for managers on this policy and the associated arrangements. All managers who have an involvement in the recruitment and selection process will receive specialist training.

12 Monitoring

12.1 The Group deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly,

a monitoring system will be introduced to measure the effectiveness of the policy and arrangements.

12.2 The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnic origin, sexual orientation, religion / beliefs, grade and length of service in current grade. Information regarding the number of staff who declare themselves as disabled will also be maintained.

12.3 There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.

12.4 We will maintain information on staff who have been involved in certain key policies: Disciplinary, Grievance and Bullying & Harassment.

12.5 Where appropriate equality impact assessments will be carried out on the results of monitoring to ascertain the effect of the Group policies and our services / products may have on those who experience them.

12.6 The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

12.7 If monitoring shows that the Group, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the Group, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, Group policies and practices as well as consideration of taking legal positive action.

12.8 Monitoring information concerning employed staff is held on SAGE, the human resources database system.

13 Review

13.1 The effectiveness of this policy and associated arrangements will be reviewed annually by the Human Resources Department.

13.2 All employment policies and arrangements have a bearing on equality of opportunity. The Groups other policies will be reviewed regularly by Human Resources and any discriminatory elements removed.