

Inclusion, Diversity and Equality Policy

1. Policy Statement

The Company recognises that discrimination is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce.

It is the aim of the Company to ensure that no employee or job applicant receives less favourable facilities or treatment on grounds of sex, marital status, sexual orientation, disability, race, colour, nationality, ethnicity, religion, dependents or age or are placed at a disadvantage by imposed conditions or requirements which cannot be shown to be justified. The Company wishes to see its workforce and applicant base broadly reflecting the community in which its premises or clients are based.

This Policy applies to potential, actual employees and all applicants we represent and relates to all aspects of employment, including recruitment, promotion, training, grievance and disciplinary procedures and to the arrangements made for working in Universal Group. Current staff and new applicants for appointments or promotion shall be assessed on the basis of their suitability, capability and qualifications.

This Policy and the associated arrangements shall operate in accordance with statutory requirements.

2. Overview of Relevant Legislation

The law states that that Company must offer equal opportunities of employment to both potential and existing employees.

Legislation states that the following is unlawful :-

- to discriminate against men or women on the grounds of sex or marriage.
- to discriminate on racial grounds (including race, colour, nationality and ethnic/national origin).
- to unjustifiably discriminate against an individual on the grounds of his/her disability.
- to discriminate between men and women in pay and other terms of their employment contract.
- to discriminate on the grounds of membership of a

Trade Union.

- to discriminate against anyone who, in good faith, discloses information of Company wrong-doing in accordance with the public interest disclosure legislation.
- to discriminate against anyone on the grounds of their religious beliefs or sexual orientation.
- to discriminate against anyone on the grounds of their age.

3. Types of Discrimination

Please note - Where discrimination against any person or group is referred to it shall be deemed to be potential discrimination within any of the categories listed in the policy statement above.

Discrimination at work can occur in a number of ways. The company aims to ensure that no practices, procedures, attitudes or behaviour allow discrimination.

The following types of discrimination will not be tolerated:-

Direct Discrimination

Direct discrimination occurs when a person or group is treated less favourably than others.

Any recruitment decision or treatment of any person/group on the basis of their sex, marital status, disability, race, colour, nationality, ethnicity, sexual orientation, religion, or age is unlawful. It also is unlawful for an employer to discriminate against a job applicant whose conviction is spent.

Indirect Discrimination

Indirect discrimination is when an unjustifiable requirement or condition is imposed on a group of people which seems to be the same for everyone, but actually has a disproportionately unfair effect on some individuals only because of their sex, marital status, disability, race, colour, nationality, ethnicity, sexual orientation, religion, or age.

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Victimisation

Victimisation occurs when a person is treated less favourably because they have taken action or sought the protection of the legislation as described in Section 2 above.

4. Rights of Disabled People

The Company attaches particular importance to the needs of disabled people.

Under the terms of this policy, managers are required to:

- make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: The HR Department will advise managers on the availability of funds from external agencies to maintain disabled people in employment);
- include disabled people in training/development programmes;
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

5. Managerial Responsibility

The responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Managing Director. Senior managers shall ensure that they and their staff operate within the policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each manager 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.

It is the responsibility of senior managers to monitor the operation of the policy in respect of employees and job applicants, including periodic departmental audits.

6. Staff Responsibility

Whilst the responsibility for ensuring that there is no unlawful discrimination rests with management, 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 on the grounds specified in the policy statement;
- inform their manager if they become aware of any discriminatory practice.

7. Recruitment & Selection

The Company aims to ensure that there is no unlawful discrimination at any stage of the recruitment process (i.e. advertising jobs, short-listing applications, interviewing/assessment procedures and the final selection decision).

This is achieved by:

- ensuring skills, knowledge and experience requirements are appropriate and relevant to the job;
- structuring interviews so that no discriminatory questions are asked;
- assessing skills and ability through appropriate selection activity;
- ensuring all selection decisions are based on the agreed criteria and apply equally to all candidates
- any legislative change will be communicated to staff and training provided as required to comply with this policy.

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8. Training and Promotion

The Company aims to ensure that equal access to training, promotion and career opportunities is provided by:

- ensuring that the selection criteria for training and development opportunities are fair and objective;
- designing a Performance Management process in which fair and objective appraisals are undertaken.

9. Monitoring and Reporting

All employees must ensure that their actions comply with this policy at all times.

Human Resources and the Senior Management team will be responsible for developing and implementing monitoring systems to ensure that the Inclusion, Diversity and Equality policy is observed, within the guidelines set by the Data Protection legislation.

This information is confidential and access is restricted. The data will be used to monitor relevant policies and procedures and support changes to practices when needed, and to ensure that appropriate equal opportunities training is provided across all operations of the business.

10. Breaches of the Inclusion, Diversity and Equality Policy

Any complaint concerning discrimination or victimisation should be discussed with a manager of the business or dealt with through the grievance procedure.

The Company will regard any breach against the policy as a serious offence, which may result in disciplinary action being taken against an employee, which may, if proven, be either a formal warning or summary dismissal dependent on the seriousness of the offence.

Any client practice deemed in breach of the Inclusion, Diversity and Equality Policy will be reviewed on an individual basis with agreed actions concluded by Senior Management and communicated to the relevant client.

11. Review

The policy and arrangements will be reviewed annually by the HR Manager and the Senior Management Team.