

Schedule 1 Equal opportunities policy

1. Purpose

- 1.1 DHW CIC values its reputation as an open, fair and independent organisation operating as a social enterprise with a high standard of integrity and commitment to its aims and objectives. This reputation is dependent on the conduct of its Directors, Board members, Employee and volunteers (herein after collectively called Representatives) as they carry out their agreed duties and responsibilities.
- 1.2 It is DHW CIC's policy not to discriminate against its Representatives on the basis of their gender, sexual orientation, marital status, any gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy or trade union membership or the fact that they are a part-time worker, fixed-term employee or volunteer.
- 1.3 Our Representatives and applicants for employment or volunteering roles shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes.
- 1.4 DHW CIC shall, at all times, strive to work within legislative requirements as well as promoting best practice. The Board of Directors long-term aim is that the composition of our organisation should reflect that of the community and that all Representatives should be offered equal opportunities to achieve their full potential.
- 1.5 We are committed to a programme of action to make this policy effective and to bring it to the attention of all Representatives. The principle of non-discrimination and equality of opportunity applies equally to the treatment of visitors, service users, customers and suppliers by our Representatives and also, in some circumstances, ex-employees.
- 1.6 DHW CIC's Equality and Diversity Statement will be on the organisation's website, form part of its values and be reviewed on an annual basis.
- 1.7 The following paragraphs deal with the specific categories of Representatives and areas of work which we have identified as potentially giving rise to equal opportunities issues and provides more specific guidance on the parameters of our policy and approach to equal opportunities.

2. Scope of policy

- 2.1 This policy applies to all Representatives, specifically, DHW CIC's employees, whether permanent, temporary, casual, part-time or on fixed-term contracts, to ex-employees, to job applicants and to individuals such as directors and members who are not our employees, but who work at DHW CIC offices.

- 2.2 All Representatives have a duty to act in accordance with this policy, and therefore to treat colleagues with dignity at all times, and not to discriminate against or harass other Representatives, whether junior or senior to them. In some situations, DHW CIC may be at risk of being held responsible for the acts of individual Representatives and therefore shall not tolerate any discriminatory practices or behaviour.
- 2.3 The policy statement above applies equally to the treatment of our service users and suppliers.
- 2.4 Personnel Responsible for this Policy:
- i. The Board of Directors has overall responsibility for the effective operation of DHW CIC equal opportunities policy (EOP) and for ensuring compliance with the relevant statutory framework prohibiting discrimination. The Board of Directors has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to the DHW CIC Chief Officer.
 - ii. Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of DHW CIC with regard to equal opportunities. To facilitate this process, all Employee shall be given an appropriate induction and appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice as required.
 - iii. All Representatives are responsible for the success of this policy and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives. Any representative involved in management or recruitment, or who has any questions about the content or application of this policy, should contact the Chief Operating Officer to request training or advice.

3. General Principles

- 3.1 DHW CIC will not unlawfully discriminate or act in a way which discriminates against others or which demeans others because of or on the grounds of a protected characteristic (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation) in any circumstance, whether or not that person holds that particular protected characteristic or not. Nor will DHW CIC act in a way which unlawfully discriminates on the grounds of trade union membership, part-time or fixed term employment status.
- 3.2 This policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay; to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment, including redundancy.

3.3 DHW CIC will take appropriate steps to accommodate the requirements of Representatives' religions, cultures, and domestic responsibilities.

4. Forms of Discrimination

- i. **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- ii. **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- iii. **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which 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.
- iv. **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- v. **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

5. Recruitment and Selection

5.1 DHW CIC aims to ensure that no job applicant or volunteer/member applicant receives less favourable treatment on any of the unlawful grounds listed in paragraph 10. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Selection criteria are regularly reviewed to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

5.2 DHW CIC shall take steps to ensure that knowledge of vacancies reaches a wide labour/volunteer market and, where relevant, groups under-represented in DHW CIC. Where appropriate, use may be made of lawful exemptions to recruit suitably-qualified people to cater for the special needs of particular groups. Vacancy advertisements shall include an appropriate short statement on our equal opportunities policy.

5.3 To ensure that this policy is operating effectively with respect to recruitment and selection and the other areas identified in this policy, and to identify those sections of the local community which may be under-represented in employment or volunteering,

DHW CIC monitors applicants' racial origins, gender, disability, sexual orientation and religion and age as part of the recruitment procedure. We also maintain records of this data in an anonymised format solely for the purposes stated in this policy. Ongoing monitoring and regular analysis of the data provide the basis for taking appropriate positive steps to eliminate unlawful direct and indirect discrimination and implement this policy

6. Staff Training, Promotions and Conditions of Service

- 6.1 Representative training needs shall be identified through induction, regular supervision and appraisals. All Representatives will be given an equal opportunity and access to training to enable them to progress within the organisation. All promotion decisions shall be made on the basis of merit.
- 6.2 All Representatives will be required to undergo training every 2 years to ensure they keep up to date on best practice and legislation relating to equality, diversity and discrimination.
- 6.3 The composition and movement of Representatives at different levels shall be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.
- 6.4 Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all Representatives who should have access to them and that there are no unlawful obstacles to accessing them. This includes pay, policies and all benefits offered, such as pension entitlements.

7. Termination of Employment

- 7.1 DHW CIC will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against employees.
- 7.2 DHW CIC will also ensure that disciplinary procedures are carried out fairly and uniformly for all Representatives, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

8. Disabilities

- 8.1 If a representative is disabled, or becomes disabled in the course of their employment/volunteering with DHW CIC, they are encouraged to tell DHW CIC about their condition. This is to enable DHW CIC to support them as much as possible. The representative may also wish to advise their line manager or the Chief Operating Officer of any reasonable adjustments to their working conditions or the duties of their role

which they consider to be necessary, or which would assist them in the performance of their duties.

- 8.2 A line manager or Chief Operating Officer may wish to consult with the person and with Occupational Health and your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible, reasonable and proportionate to the needs of the job. Nevertheless, there may be circumstances where it will not be reasonable for us to accommodate the suggested adjustments and we will ensure that we provide the person with information as to the basis of our decision not to make any adjustments

9. Fixed-term workers, temporary employees and agency workers

- 9.1 DHW CIC will monitor its 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 within DHW CIC to ensure that they are accessing permanent vacancies.

10. Part Time Employees

- 10.1 DHW CIC will monitor the conditions of service of part-time employees and their progression within DHW CIC to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will also ensure requests to alter working hours are dealt with appropriately.

11. Breaches of this policy

- 11.1 Any representative who believes that they may have been disadvantaged on any of the unlawful grounds listed in this policy, is encouraged to raise the matter through the DHW CIC grievance procedure.
- 11.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Representatives who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach in this policy that are found to have been made in bad faith will, however, be dealt with under the DHW CIC disciplinary procedure.
- 11.3 If, after investigation, a representative is proven to have harassed any other representative on the grounds of or because of a protected characteristic (see 10) or otherwise act in breach of this policy, they will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. DHW CIC will always take a strict approach to serious breaches of this policy.
- 11.4 As this policy applies equally to DHW CIC's Representatives' relations with service users, members of the public and suppliers, if, after investigation, a representative is

proven to have discriminated against or harassed a service user, member of the public, supplier or anyone else contacted during their work with DHW CIC, they will also be subject to disciplinary action.

12. Monitoring and Revision of the Policy

- 12.1 This policy is reviewed annually by the Board of directors. DHW CIC will regularly monitor the effectiveness of this policy to ensure it is achieving the objectives stated in the EOP statement by monitoring the composition of job/volunteer applicants and the benefits and career progression of its Representatives. DHW CIC is committed to providing relevant training for all Representatives on their responsibilities and duties under this policy.

