

<b>Equal Opportunities Policy</b>	<b>Version:</b>	2.1
	<b>Status:</b>	Final
	<b>Date:</b>	15/1/21

## 1. Approval Record

Name	Role	Date
Rebecca Clarke	Head of People	1/8/20

## 2. Version History

Version	Date	Author	Description (nature of change/update)
0.1	1/6/20	Rebecca Clarke	Initial Creation – Document design proposal
2.0	1/8/20	Rebecca Clarke	Final version
2.1	15/1/21	Rebecca Clarke	Annual Review and version control update

## 3. Related Documents

Document Title	Location	Version Number
Disciplinary and Grievance Policy	HR System	1.1

## 4. Review and Distribution List

Name	Role	Review Required
Rebecca Clarke	Head of People	Contributor / Reviewer
All Staff		For Information Only

## 5. Regulatory Requirements

Equality and Diversity Act

## 6. Introduction

### 6.1 Purpose

This policy sets a framework for ensuring equal opportunities for all. The policy ensures members of staff act professionally and have a reporting process in place.

### 6.2 Scope

This policy applies to all members of staff who work under a contract of employment with We are Digital. It also applies to agency staff, contractors, and others employed under a contract of service.

## 7. Roles and Responsibilities

RACI	Role	Role Holder(s)	Key Responsibilities
Responsible	Process SME	Rebecca Clake	<ul style="list-style-type: none"> <li>Ensuring process document accurately reflects current practice</li> <li>Contributing to process changes and improvements, as and when identified</li> </ul>
Accountable	Process Owner	Rebecca Clake	<ul style="list-style-type: none"> <li>Overall ownership and accountability for process definition and execution</li> <li>Leading change for improving the process</li> <li>Approval point for any changes/update to the process definition</li> <li>Ensuring that any changes are properly documented and communicated</li> <li>Ensuring that ongoing monitoring is in place and carried out</li> </ul>
Consulted	Head of People	Rebecca Clake	<ul style="list-style-type: none"> <li>Monitoring adherence to agreed process through periodic quality reviews</li> </ul>
Informed	All Staff Subcontractors		<ul style="list-style-type: none"> <li>Read and accept of document must be completed in HR system</li> <li>To be included in subcontractor paperwork</li> </ul>

## 8. Instruction

We are Digital Training Limited is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

This Policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.

The Company also aims to provide a service that does not discriminate against its clients and customers in the means by which they can access the services and goods supplied by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

### 8.1 Objectives of this Policy

To prevent, reduce and stop all forms of unlawful discrimination in line with the Equality Act 2010. To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are determined on the basis of capability, qualifications, experience, skills and productivity.

### 8.2 Designated Officer

The Head of People who is based at the Company Head Office, Friars House, Manor House Drive, Coventry, CV1 2TE.

### 8.3 Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. Discrimination may be direct or indirect.

### 8.4 Types of Discrimination

#### **Direct Discrimination**

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

#### **Indirect Discrimination**

This is the application of a policy, criterion or practice which the employer applies to all employees but which is such that:

- it is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents
- the employer cannot justify the need for the application of the policy on a neutral basis and
- the person to whom the employer is applying it suffers detriment from the application of the policy

Example: A requirement that all employees must be 6ft tall if that requirement is not justified by the position would indirectly discriminate against employees with an oriental ethnic origin, as they are less likely to be able to fulfil this requirement.

#### **Harassment**

This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

#### **Victimisation**

This occurs when a person is treated less favourably because they have brought or intend to bring proceedings or they have given or intend to give evidence.

### 8.5 Unlawful Reasons for Discrimination

#### **Sex**

It is not permissible to treat a person less favourably on the grounds of sex, marital status, civil partnership, pregnancy or maternity, gender reassignment or transgender status. This applies to men, women and those undergoing or intending to undergo gender reassignment. Sexual harassment of men and women can be found to constitute sex discrimination. Example: Asking a woman during an interview if she is planning to have any (more) children constitutes discrimination on the ground of gender.

#### **Age**

It is not permissible to treat a person less favourably because of their age. This applies to people of all ages. This does not currently apply to the calculation of redundancy payments.

### **Disability**

It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person.

### **Race**

It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.

### **Sexual Orientation**

It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because s/he is homosexual, heterosexual or bisexual.

### **Religion or Belief**

It is not permissible to treat a person less favourably because of their religious beliefs or their religion or their lack of any religion or belief.

## 8.6 Positive Action in Recruitment

Under the Equality Act 2010, positive action in recruitment and promotion applies as of 6 April 2011. 'Positive action' means the steps that the Company can take to encourage people from groups with different needs or with a past record of disadvantage or low participation, to apply for positions within the Company.

If the Company chooses to utilise positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably, it will be used only in tie-break situations, when there are two candidates of equal merit applying for the same position.

## 8.7 Reasonable Adjustments

The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- making adjustments to premises
- re-allocating some or all of a disabled employee's duties
- transferring a disabled employee to a role better suited to their disability
- relocating a disabled employee to a more suitable office
- giving a disabled employee time off work for medical treatment or rehabilitation
- providing training or mentoring for a disabled employee
- supplying or modifying equipment, instruction and training manuals for disabled employees or
- any other adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company

If an employee has a disability and feels that any such adjustments could be made by the Company, they should contact the Designated Officer.

## 8.8 Responsibility for the Implementation of this Policy

All employees, subcontractors and agents of the Company are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination, harassment or victimisation on the grounds of their race, sex, pregnancy or maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

The co-operation of all employees is essential for the success of this Policy. Senior employees are expected to follow this Policy and to try to ensure that all employees, subcontractors and agents do the same.

Employees may be held independently and individually liable for their discriminatory acts by the Company and in some circumstances an Employment Tribunal may order them to pay compensation to the person who has suffered as a result of discriminatory acts.

The Company takes responsibility for achieving the objectives of this Policy, and endeavours to ensure compliance with relevant Legislation and Codes of Practice.

## 8.9 Dedicated Grievance Procedure

If an employee feels that they have suffered direct or indirect discrimination they are encouraged to attempt to raise and solve the issue informally before commencing the formal procedures detailed below. Informal steps that may be taken by the employee include talking to their manager about the issue, or talking directly to any individual who the employee feels is responsible for the discrimination. This can be done verbally or by letter, and can be with the accompaniment of a colleague or trade union representative. Where the informal procedure is used, both parties should keep a written record of the meeting including what was discussed and any proposed action.

If the employee feels unable to deal with the issue informally, or if informal steps have failed to solve the problem, the employee should raise the matter according to the formal procedure detailed in the company's Grievance Policy and Procedure.

## 8.10 Records and Confidentiality

The Company shall be responsible for taking notes of the proceedings of each meeting during the Grievance procedure. Copies of meeting notes will be provided to the employee. All Grievances will be handled with as high a degree of confidentiality as is practicable, with special consideration for the often sensitive nature of grievances falling under this Policy. Confidential records of the Grievance will be kept in the employee's personnel file in accordance with Data Protection legislation.

## 8.11 Employees Engaging in Discriminatory Conduct

Behaviour or actions found to be contrary to this Policy and the general spirit of the laws on which it is based will be considered to be serious disciplinary matters.

In the most severe of cases, the employee responsible may face dismissal. Any such employees will have the right to appeal against such a summary dismissal by following the Companies grievance procedure.

Discrimination leads to an unpleasant and non-productive work environment. No employee has the right to discriminate against another. If an employee is executing Company policy that may be indirectly discriminatory, the Company will not normally hold the employee responsible for any negative effects of that policy. Employees should inform the Designated Officer if they become aware of any discriminatory effects that a policy may have.

If a grievance is received by the Company that cites the actions of an employee have been discriminatory against another member of staff, the Company will deal with the breach of policy through the Disciplinary Policy and Procedure.

### 8.12 Prevent Training and British Values

To support WAD’s Anti Radicalisation Policy all staff will be required to complete the PREVENT training programme to give them a greater understanding of how they can get involved in preventing radicalisation of individuals.

WAD encourages it’s employees, contractors and agency workers to recognise, respect and learn more about all cultures residing in the UK. We will ensure that all individuals understand the core British Values as outlined by the relevant guidance provided to Training Providers involved in delivery of funded learning.

## 9. Quality Control Log

No	Risk/Issue	Control	Control in Place Y/N
1	Inconsistent execution of the process by different people/departments	Training in place for managers and central point of control	Y

## 10. Glossary

Term	Description