

 SHORTWOOD SOLUTIONS LTD.	<i>EQUAL OPPORTUNITIES POLICY</i>	SS-ED-01	
		Version: 1	09/04/2024
		Audit due: 09/04/2025	Pages: 9

Shortwood Solutions Limited
 Equal Opportunities Policy
 SS-ED-01

Prepared by:	Approved by:
Kathleen Lee Director	Oliver Lee Director
Distribution: To be communicated with all employees regardless of the nature of their contract, and sub-contractors, affiliates, and stakeholders	

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Equal Opportunities Policy

Shortwood Solutions Limited aims to promote equality and diversity in the workplace and provide a positive and inclusive working environment free from discrimination, harassment, bullying and victimisation. We aim to ensure that all our team members feel respected and valued and capable of participating in a positive working environment. We remain dedicated to ensuring that all employment decisions are taken based on the legitimate needs of the organisation, and that Shortwood Solutions is found by all to have a zero-tolerance culture for harassment and bullying.

About this policy

This policy applies to everyone who works for the Company or who acts on the Company's behalf. All team members have a role in promoting equality at work. We all have a personal responsibility to comply with the policy and to ensure, as far as possible, that others do the same.

The Board of Directors at Shortwood Solutions will retain responsibility for this policy, ensuring that all employees understand their rights and obligations as detailed within it, and providing any necessary training on equal opportunities. The Director has overall operational responsibility for its implementation.

All staff have a personal and professional responsibility to ensure that they comply with this policy and treat their colleagues and business connections with dignity and respect. All staff have the responsibility not to discriminate against or harass other members (current or former) of staff, visitors, clients, customers, contractors or suppliers,

This policy does not form part of your contract with Shortwood Solutions Limited. The employer may amend it at any time at its absolute discretion.

The legal framework

As per the Equality At (2010) is illegal to discriminate against a person on the basis of any of the following Protected Characteristics:

- Age
- Disability
- Gender reassignment
- Marital or civil partner status
- Pregnancy or maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion, religious belief or similar philosophical belief
- Sex
- Sexual orientation (ie homosexuality, bisexuality or heterosexuality)

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What is Discrimination?

There are four basic types of unlawful discrimination:

Direct discrimination

This means treating someone less favourably than you would treat others because of a Protected Characteristic. For example, rejecting a job applicant due to their faith or refusing a promotion due to sexual preference. This includes any less favourable treatment because you perceive a person to have a Protected Characteristic (even though they do not, in fact, have it) or because they associate with a person or group who has a Protected Characteristic.

Indirect discrimination

This means disadvantaging someone through a policy, practice, or criterion that applies to everyone but adversely affects people with a particular Protected Characteristic.

Harassment

Harassment related to any of the Protected Characteristics will be unlawful if it consists of unwanted conduct that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, offensive, degrading or humiliating environment for that person. This is inclusive of unwanted conduct which is of a sexual nature and/or less favourable treatment being given to an individual as a consequence of the rejection of or the submission to Sexual Harassment. The UK Government defines bullying and harassment as:

“... behaviour that makes someone feel intimidated or offended. Harassment is unlawful under the Equality Act 2010.

Examples of bullying or harassing behaviour include:

- *spreading malicious rumours*
- *unfair treatment*
- *picking on or regularly undermining someone*
- *denying someone’s training or promotion opportunities*

Bullying and harassment can happen:

- *face-to-face*
- *by letter*
- *by email*
- *by phone*

The law

Bullying itself is not against the law, but harassment is. This is when the unwanted behaviour is related to one of the following:

- *age*
- *sex*
- *disability*
- *gender reassignment*

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- *marriage and civil partnership*
- *pregnancy and maternity*
- *race*
- *religion or belief*
- *sexual orientation*" (from <https://www.gov.uk/workplace-bullying-and-harassment-viewed-09/04/24>)

CIPD (2023) add that harassment and bullying incorporate a “*wide spectrum of behaviour, ranging from extreme forms of intimidation, such as physical violence, to more subtle forms such as ignoring someone. Examples include:*

- *Unwanted physical contact.*
- *Unwelcome remarks about a person’s age, dress, appearance, race or marital status, jokes at personal expense, offensive language, gossip, slander, sectarian songs and letters.*
- *Isolation or non-cooperation and exclusion from social activities.*
- *Coercion for sexual favours - sexual harassment.*
- *Pressure to participate in political/religious groups.*
- *Personal intrusion from pestering, spying and stalking.*
- *Persistent unwarranted criticism.*
- *Personal insults.”* (from <https://www.cipd.org/uk/knowledge/factsheets/harassment-factsheet/> viewed 09/04/24)

Victimisation

This is the unfavourable treatment of a person because they have taken action to assert their own legal rights under discrimination law or assisted someone else to do so. For example, if a disabled employee asserts in a grievance that their employer is not complying with its duty to make reasonable adjustments, they are systematically excluded from meetings.

Disabled persons

Any form of discrimination against differently-abled persons (i.e. any unjustified less favourable treatment and/or failure to make reasonable adjustments to alleviate disadvantages caused by a disability) will not be tolerated. Reasonable adjustments will be made to the work environment wherever required (and as advised by medical or other relevant professionals) in order to ensure equality of opportunity of access to the workplace. Where intrinsic to the nature of employment, job offers can be made conditional to a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms - these must not be used for selection or decision-making purposes.

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If you are disabled or become disabled, we ask you to inform us so that we can support you as much as possible and discuss any adjustments that may help you. If we consider any particular adjustment unreasonable, we will offer transparent explanations and attempt to find suitable alternatives. For the purposes of this policy, the term 'disability' includes any physical or mental impairment which substantially affects your ability to perform day to day activities and has lasted (or is likely to last) more than 12 months. Disclosure of this information will be treated in confidence, in so far as is reasonably practicable, and we will do our best to handle matters sensitively and ensure that you are treated with dignity and respect for your privacy.

Shortwood Solutions Limited will not tolerate abuse of their staff in any form, be it verbal, non-verbal, direct, indirect, or inclusive of all forms, including virtual/cyber abuse and discrimination.

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Equal opportunities in employment

We commit to avoiding unlawful discrimination in all aspects of employment, including:

- **Recruitment**
 - Only proportionate recruitment criteria, directly relevant to the advertised post, and reflective of genuine business needs will be specified.
 - Vacancies will be advertised to a diverse audience and will avoid any informal recruitment processes that exclude fair competition
 - Any job advertisements will be reviewed carefully before posting to ensure stereotyping is avoided and no groups of people are discouraged unjustifiably from applying.
 - As already stated, health and disability will not be asked about before a job offer is made. Where relevant, a conditional job offer can be extended dependent upon the satisfactory passing of a medical check
 - Candidates will not be asked about any protected characteristic, nor will assumptions be made about immigration status.
 - So far as reasonably practicable, a written account will be kept of reasoning for relevant decisions
 - The employer is responsible for verifying that all employees have the right to work in the UK. Before starting employment, the candidate must produce original documents to the employer's satisfaction, irrespective of nationality.
- **Opportunities for training, appraisals and career development**
 - Training needs will be identified during the annual appraisal process, and appropriate training to support career progression and actualisation will be accessible. Training and promotion/career progression decisions will be determined based on merit and the legitimate needs of the company.
- **Terms of employment, pay conditions and benefits**
 - All terms and conditions will be specified, including pay, benefits, working conditions and employer/ employee responsibilities. All elements of employment will be benchmarked against similar roles, and there will be no discrimination based on gender or any other protected characteristics.
 - Part-time and fixed-term staff will be treated the same as full-time staff of the same position and will be afforded the same terms and conditions regarding their employment contract and schedule unless different treatment is justified.
- **Work related social events**
 - Activities that are inclusive of all employees will be selected as work related social events,
- **Conduct / Discipline**
 - Disciplinary procedures and penalties will be undertaken without discrimination, regardless of the final outcome.

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- **Termination of employment and matters arising after employment, including references**
 - Any redundancy selection criteria and procedures that are used, or other decisions taken to terminate employment, will be fair and not directly or indirectly discriminatory
 - Any references given will be fair and accurate. You may be able to challenge a reference if you think it is unfair or misleading.

Breaches of the policy

All staff members have a right to equality of opportunity and an obligation to uphold this policy. Managers must take responsibility for implementing the policy and taking positive steps to promote workplace equality.

Any violation of the Equal Opportunities policy is a serious matter and will be fully investigated. Where appropriate, cases of deliberate discrimination will amount to gross misconduct and may potentially lead to dismissal.

It should also be noted that individuals may be held personally liable for their acts of discrimination and that legal action may be taken by the victim of any discrimination. In some cases, intentionally harrassing or discriminating against another person may amount to a criminal offence.

You must not be victimised or retaliated against for complaining about discrimination. Equally, allegations found to be false upon investigation will be treated as misconduct.

If you feel you have encountered discrimination

If you believe you have suffered discrimination, you can file a complaint through our grievance procedure. Complaints will be treated in confidence as far as practicable and investigated as appropriate.

Every member of Staff has a responsibility to address discrimination if they encounter it. Staff who observe or are aware of behaviours, incidents or anything else that could be considered to be discriminatory are encouraged to report these to the Director.

The Director will then determine what they feel is an appropriate course of action in order to address the issues. It may be, if appropriate, that the parties involved are invited to debrief, separately or together, to resolve any issues. However, this may not always be practical. As previously stated, complaints will be treated with confidence; however, it sometimes may be necessary to disclose the complaint or act even if this is not in line with your wishes (e.g. if parties involved are perceived to be at risk of harm for example) but we will seek to protect you from victimisation and, if you wish, we will seek to protect your identity. You should be aware that disciplinary action may be impossible without your cooperation or if you refuse to allow relevant information to be disclosed.

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Staff who raise a complaint about or report discrimination in good faith will be protected from retaliation or victimisation. As long as you act in good faith, the fact that you have raised a complaint or report will not affect your position within the Employer, even if the complaint is not upheld. Making a false allegation deliberately and in bad faith is a misconduct offence and will be dealt with in accordance with our disciplinary policy. Any member of Staff who attempts acts of retaliation or victimisation may be subject to disciplinary action up to and including summary dismissal for gross misconduct.

If you make a complaint, it may be necessary to ask you to stay at home on paid leave while investigations are being conducted and the matter is being dealt with through the appropriate procedure. This may particularly be necessary in cases of alleged harassment.

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DOCUMENT REVISION

Date	Revision	Prepared by	Agreed by
09.04.2023	1	Kathleen Lee (Director)	Oliver Lee (Director)