



## Diversity and Equal Opportunities Policy

## DIVERSITY AND EQUAL OPPORTUNITIES POLICY

### Our Commitment

TPP is proud to be a multi-cultural organisation. We are committed to promoting equality and diversity within an inclusive and supportive environment.

In particular, we will: -

- ensure that all individuals are treated fairly, and with dignity and respect;
- ensure that opportunities we provide are open to all;
- promote diversity by recognising the particular contributions that can be made by those with different backgrounds and experiences;
- create and maintain a safe, supportive and welcoming work environment for our employees, candidates and visitors that is free from harassment and bullying;
- strive to make sure that our clients meet their own diversity targets.

The Company wholeheartedly supports the principle of diversity and equal opportunities in employment and opposes all forms of unlawful and unfair discrimination towards employees, candidates, customers and suppliers on the grounds policy of race, colour, ethnic or national origins, nationality, sex, gender reassignment, marital, parental or civil partnership status, pregnancy, HIV status, religion, sexual orientation, age, disability and political belief or membership or non-membership of a Trade Union or spent convictions and places an obligation upon all staff to respect and act in accordance with the policy.

We believe that it is in our own best interests, and those of our employees and candidates, to ensure that the people, talents and skills available throughout the community are considered when employment opportunities arise. We are committed to calling upon the widest range of knowledge, skills and experience, complying with the relevant legislation and codes of practice and achieving and maintaining a workforce that is representative of the local community in which we operate.

We take every possible step to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, training, promotion and career management are based only on objective and job related criteria. Decisions relating to clients and suppliers will be based on business-related criteria only and any irrelevant information will not form part of the process.

The aim of the policy is to ensure that no job applicant, employee, candidate or temporary worker should receive less favourable treatment on any grounds and wherever possible, they are given the help they need to attain their potential to the benefit of the Company and themselves, and will extend to all aspects of our dealings with clients, suppliers and the general public.

The Company shall not discriminate unlawfully which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. The Company will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the particular vacancy.

This policy is intended to assist the Company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

The policy will be reviewed on ongoing basis to judge its effectiveness and reflect changes in the law, demographics and internal business requirements.

### Our Diversity Ethos

We value the differences that a diverse workforce can bring to our organisation.

We understand that an employee and candidate community that draws upon a variety of backgrounds, skills, attitudes and experience is crucial to the creativity and innovation we need to drive our business forward.

We understand that diversity brings positive benefits that will improve and strengthen our business. We are serious about being customer-driven and recognise that this can only be achieved by being fair employers and business people.

We strive to build a culture that values meritocracy, openness, fairness and transparency.

### Implementation

It is the responsibility of TPP to promote equality of opportunity and diversity in employment and to monitor the implementation of this policy.

The Managing Director is the Company's senior level diversity and equal opportunities champion and as such is, on behalf of :Ltd, the individual responsible for the effective operation of the policy

A copy of our Diversity and Equal Opportunities Policy is available in the Company's Employee Handbook and displayed in all reception areas.

The Company will ensure that the policy is effectively communicated and that proper training and guidance is given to ensure that everyone fully understands their responsibilities as set out both in the policy, codes of practice and the legislation.

All employees have a responsibility to observe this policy and to ensure that diversity management and equality of opportunity is continuously provided for in the Company's activities.

In addition, managers have a particular responsibility for ensuring the policy is fairly and consistently applied in all areas under their control.

Employees are encouraged to assist in the removal of any discriminatory practices that may exist in the Company by drawing them to the attention of the management, who oversee our Diversity and Equal Opportunity Policy.

Areas covered by the policy:

Equal opportunities in employment – Code of Recruitment Practice

- the Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy;
- the Company is responsible for ensuring that no employee or job applicant receives less favourable treatment and that no employee or job applicant is placed at a disadvantage by requirements that are either directly or indirectly discriminatory;
- the Company has an open recruitment policy and uses a wide spectrum of different attraction methods e.g. press advertising campaigns, Internet, and local bespoke campaigns. The Company will utilise JobCentre Plus and, wherever possible recruit from the local community;
- the Company exercise proactivity in diverse markets by using publications targeted at a range of ethnic groups and by aiming to advertise in areas of the community where ethnic minorities live;
- person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary;

- job applicants and employees will be asked to complete the appropriate application form in order to ensure a consistent information base for interview shortlists. The form will consist of two sections – a) qualification and employment experience b) personal information including sex, age, nationality etc. Selection for interview will occur after consideration of Section (a) Indt;

Section (b) will be used in accordance with the Monitoring category of the Equal Opportunities Policy as detailed. The Company guarantees that this section of the form will only be used for the purpose of monitoring the effectiveness of its equal opportunities policy;

- all Company employees required to select staff/progress candidate applications undergo appropriate training in Interview and Selection techniques;
- application forms and interview records must be kept as required through legislation after the completion of a recruitment campaign to ensure a detailed response can be given to those regretted candidates who challenge the fairness and objectivity of the recruitment process;
- the Company cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the Company may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group which the Company identifies as being underrepresented in particular types of job;
- the Company recognises the need for working arrangements to be flexible enough to accommodate the shifting priorities of its staff and offer individuals a better fit between working lives and domestic arrangements;
- the Company will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the Company considers it has good reasons, unrelated to any prohibited ground of discrimination, for doing so. The Company will comply with its obligations in relation to statutory requests for contract variations. The Company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability;
- the Company support the work-life balance through, for example, adoptive, maternity and paternity leave, flexible working hours, part time working, job sharing, home working, parent's contracts, reduced contractual hours, career breaks, special leave, carer leave, assistance with childcare and parental leave;

- working hours may also be adapted to meet cultural or religious needs, such as prayer times and holy days as in the Religious or Creed and personal Beliefs Section of this Policy. Flexible arrangements facilitate our retention of skilled and experienced workers and can contribute to improved team working and enhanced individual output;
- the Company is committed to retaining staff, and is open to individual requests for flexible arrangements. Ten percent of the Company's employees have, for a number of years, enjoyed the benefits of flexible working hours, working from home and part time working;
- the Company will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

#### Religious or Creed and Personal beliefs

Neither the Company nor its employees will discriminate against any creed, religion or personal belief provided such creeds and beliefs do not run counter to this policy by advocating discrimination or intolerance of other employees. The Company will endeavour to accommodate as far as practicable essential practices related to such creeds provided that they neither breach Company policy nor interfere with the efficient running of the business or its legal obligations e.g. health and safety.

#### Disability

##### Direct Discrimination

Direct discrimination against a person occurs where, if for a reason which relates to the disabled person's disability, an individual:

- treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply, and,
- Employer cannot show that the treatment in question is justified.

Or

- If on the ground of a disabled person's disability, he treats the disabled person less favourably than he treats or would treat a person not having that particular disability, whose relevant circumstances, including his abilities, are the same as, or not materially different from, those of the disabled person. This type of direct discrimination can never be justified.

## Duty to make reasonable adjustments and to provide auxiliary aids and services

This is a similar protection to indirect discrimination in the other protected categories.

Where a provision, criterion or practice applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be the duty of an employer to take such steps as are reasonable, in all the circumstances of the case, to remove the provision, criterion, practice or physical feature.

Agencies must take reasonable steps to provide auxiliary aids or services if this would make it easier for the disabled person to use their services. For instance, an appropriate auxiliary aid or service can include the provision of information on audiotape or provision of a sign language interpreter.

The Company will not discriminate against a disabled person on the grounds of disability -

- in the arrangements i.e. application form, interview or arrangements for selection for determining to whom a job should be offered; or
- in the terms on which employment or engagement of temporary workers is offered; or
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- By subjecting him or her to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

The Company will accordingly make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Wherever possible The Company will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

## Age

TPP will not discriminate directly or indirectly, harass or victimize any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skills and not age.

The Company is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age.

No age requirements will be stated in any job advertisements on behalf of the company.

The Company will request age as part of its recruitment process but such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process.

## Part-Time Workers

This Diversity Policy also covers the treatment of those employees and workers who work on a part-time basis. The Company recognizes that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. The Company also recognizes that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

## Harassment Policy

The Company is committed to providing a work environment free from unlawful harassment on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or any other basis protected by legislation is unlawful and will not be tolerated by the Company.

This policy prohibits unlawful harassment by any employee or worker of the Company.

Examples of prohibited harassment are: -

- Verbal or written conduct containing derogatory jokes or comments,

- Slurs or unwanted sexual advances
- Visual conduct such as derogatory or sexually orientated posters,
- Photographs, cartoons, drawings or gestures which some may find offensive,
- Physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected category basis,
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours
- Retaliation for having reported or threatened to report harassment.

If you believe that you have been unlawfully harassed, you should make an immediate report to any director of the company followed by a written complaint as soon as possible after the incident. Your complaint should include:

- Details of the incident
- Name(s) of the individual(s) involved
- Name(s) of any witness(es)

The Company will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

Any employee(s) who TPP finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination. [A person who discriminates or harasses may be personally liable for payment of compensation to the person offended, in addition to any compensation payable by TPP]. There is no statutory cap on the amount of compensation which may be awarded in discrimination cases. Under the Criminal Justice Act 1994, harassment became a criminal offence, punishable by a fine of up to £5,000 and/or a prison term of up to 6 months. Under the Protection from Harassment Act 1997, the penalties for aggravated harassment are an unlimited fine and/or 5 years imprisonment.]

### Gender Reassignment

The Company recognizes that any employee or worker may wish to change their gender during the course of their employment with the Company.

The Company will support any employee or worker through the reassignment provided that full medical counselling has been undertaken and the Company has access to any relevant medical reports.

The Company will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

All employees and workers will be expected to comply with Company's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary sanction.

Where an employee is engaged in work where the gender change imposes genuine problems, The Company will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should make recourse to the Company's grievance procedure.

#### Dignity at work

The Company will not tolerate harassment or intimidation of an individual. The Company has a separate Dignity at Work policy concerning issues of bullying and harassment on any ground, and how complaints of this type should be dealt with.

#### Clients, suppliers and other people not employed by the Company

The Company will not discriminate unlawfully against clients using or seeking to use facilities or services provided by the Company.

Employees should report any bullying or harassment by clients, suppliers, visitors or others to their managers who will take appropriate action.

#### Liability

Employers can be held liable in law for acts of discrimination committed by employees.

Individual employees can be held personally liable for acts of discrimination that they commit, authorise, contribute to or condone.

Behaviour or actions by employees, which go against the spirit or letter of this policy, would constitute serious misconduct liable to disciplinary action, which may include summary dismissal.

The following are examples of such action, however the list should not be seen as exhaustive:

- discrimination in the course of their employment against employees or job applicants in any aspect of employment or pre-employment on grounds established within the Equal Opportunities Policy Statement;
- inducing or attempting to induce, employees or managers to practice unlawful discrimination;
- indulging in verbal or physical sexual or racist harassment of a nature which known, or should be known, to be offensive to the victim;
- victimising individuals who have made allegations or complaints of sexual or racial discrimination or harassment or provided information about such discrimination or harassment.

#### Training and communication

The Company undertakes to provide training and information for employees to ensure that they understand their position in law, the Company's equal opportunity policies and their responsibilities under this policy. In particular, mandatory training will be incorporated into: -

- first appointment supervisor/manager programmes;
- induction programmes;
- recruitment/selection programmes.

Objectives relating to fair and inclusive practices will be included in all employees' performance indicators and will form an integral part of performance reviews throughout the year.

External agencies and contractors offering services to the Company will be briefed on and expected to act in accordance with the policy.

The Company also provides training to all existing and new employees and others engaged to work at the Company to help them understand their rights and responsibilities under the Dignity at Work policy and what they can do to help create a working environment free from bullying and harassment.

#### Monitoring and review

This policy will be monitored periodically by the Company to judge its effectiveness and will be updated in accordance with changes in the law. Corrective action will be taken where appropriate.

In particular, the Company will monitor the ethnic and gender composition of the existing workforce (to include employees and independent contractors)

and of candidates for jobs (including promotions), and the number of people with disabilities within these groups, and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the Company will implement them.

The provision of training and development opportunities through the management is monitored annually to ensure that there are no inequalities in either the content of the training or the opportunities for employees.

Grievance and disciplinary cases are ethnically monitored to establish and ensure that the policies are being applied equally and appropriately in the circumstances of each case.

Reasons given for leaving the Company's employment are monitored to establish any retention problems related to inequality

#### Grievance and Disciplinary Procedure

The Company has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. Any employee who considers that they may have been unlawfully discriminated against, may use the Company's grievance procedure to make a complaint. If their complaint involves bullying or harassment, the grievance procedure is modified as set out in the Dignity at Work policy.

The Company will take any complaint seriously, will investigate it fully and will seek to resolve any grievance that it upholds. Employees will not be penalised for raising a grievance, even if their grievance is not upheld, unless their complaint is both untrue and made in bad faith.

#### Our commitment to the future

Alongside all the ongoing monitoring we carry out, we understand that although a Diversity and Equal Opportunities policy is a fundamental part of our operating strategy, it will only be brought to life if it reinforced by focused and structured processes and measurements:

To this end, the Company

- has identified a senior level champion for leading the equal opportunities and diversity strategy and has secured top-level ownership and sponsorship for the diversity programme;
- will join appropriate organisations to network, exchange best practice and raise the Company's profile;
- build relationships with trade, and the local and national press to develop a good external image and to position the Company at the leading edge;

- will endeavour to capture all available workforce metrics from existing databases to benchmark against sector companies, demographics and best practice standards;
- agree the aspirational targets for the workforce composition over a five-year period with the board;
- establish formal measurement tools to assess the climate in the Company (for example, regular staff surveys);
- maintain and develop relationships with external benchmarking bodies to assess progress (for example, Race for Opportunity, Third Age Employment Network, Opportunity Now, and the Disability Rights Commission);
- audit all processes to establish the Company's position with regard to best practice
- benchmark existing policy statements from other organisations and advisory groups;
- integrate diversity further into mainstream training and development programmes;
- ensure comprehensive diversity communications programme;
- monitor progress against set targets and objectives;