

## Equality and Diversity Policy

### Our commitment

The success of Omega Supplies Ltd depends on people. By accessing, recruiting and developing people from the widest possible talent pool we can gain an insight into different markets and generate greater creativity in anticipating customer needs. We will constantly strive to create a productive environment, representative of and responsive to different cultures and groups, where everyone has an equal chance to succeed.

Accordingly, we are committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment and against customers.

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

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment.

### The law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

### Gender

Women and men are fully and properly represented and rewarded for their contribution through the organisation by:

- ▮ Challenging gender stereotypes
- ▮ Supporting employees in balancing their life at work and at home

### Race

The racial and cultural diversity of our community is represented throughout the organisation by:

- ▮ Challenging racial stereotypes
- ▮ Understanding, respecting and valuing different backgrounds and perspectives

## **Disability**

The abilities of disabled people are recognised and valued throughout the organisation by:

- ▮ Focusing on what people can do rather than what they cannot
- ▮ Challenging stereotypes about people with disabilities
- ▮ Making appropriate adjustments in the workplace to help people with disabilities to achieve their full potential

## **Age**

Age diversity is promoted within the workforce by:

- ▮ Challenging age stereotyping
- ▮ Recognising the benefits of a mixed-age workforce

## **Religious Belief and Political Opinion**

People are treated fairly in the workplace irrespective of their religious or political opinions by recognising individuals' freedom of belief and protection from intolerance and persecution.

## **HIV**

Discrimination against an employee or potential employee is not acceptable, and confidentiality will be respected in line with the wishes of any individual with HIV or AIDS.

## **Sexuality**

People are treated fairly in the workplace irrespective of their sexuality by:

- ▮ Respecting different lifestyles
- ▮ Challenging negative stereotypical views

We all have a responsibility to embrace and support this culture and must continue to challenge behaviour and attitudes that prevents us from achieving this. We aim to use fair, objective and innovative employment practices to ensure that:

- ▮ All employees and potential employees are at all times treated with respect and fairness
- ▮ All employees have the right to be free from harassment of any description
- ▮ All employees have an equal chance to contribute and to achieve their potential, irrespective of anything which could give rise to unfair discrimination.



## **Types of unlawful discrimination**

**Direct discrimination** is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

**Indirect discrimination** is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

**Associative discrimination** is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

**Perceptive discrimination** is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic.

**Victimisation** occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.

**Failure to make reasonable adjustments** is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that disability and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

## **Equal opportunities in employment**

Omega Supplies Ltd will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

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.

Omega supplies Ltd 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 organisation considers it has good reasons, unrelated to any protected characteristic, for doing so. The organisation will comply with its obligations in relation to statutory requests for contract variations and will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

The organisation will monitor the ethnic, gender and age 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.

### **Customers, suppliers and other people not employed by the organisation**

Omega Supplies Ltd will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the organisation.

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

### **Training**

Omega Supplies Ltd will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

We will provide training to all existing and new employees and others engaged to work at the organisation to help them understand their rights and responsibilities under this policy and what they can do to help create a working environment free of bullying and harassment. We will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

### **Dignity at work**

Omega Supplies Ltd is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.

Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

**Bullying** is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Examples of bullying would include picking on someone or setting them up to fail or making threats or comments about someone's job security without good reason.

**Harassment** is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- ▮ has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- ▮ is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

Examples of harassment would include: physical conduct ranging from unwelcome touching to serious assault; unwelcome sexual advances; demeaning comments about a person's appearance; unwelcome jokes or comments of a sexual or racial nature or about an individual's age; excluding an individual because they are associated or connected with someone with a protected characteristic, e.g. their child is gay, spouse is black or parent is disabled; repeated name calling related to an individual's religion or belief, ignoring an individual because they are perceived to have a protected characteristic (whether or not they do, in fact, have that protected characteristic), e.g. an employee is thought to be Jewish, or is perceived to be transgender; the use of obscene gestures; and the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person or relating to their actual or perceived protected characteristic, e.g. magazines, calendars or pin-ups.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to them, e.g. sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, e.g. certain "banter", flirting or asking someone for a private drink after work. In these cases, first-time conduct that unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

A single incident can be harassment if it is sufficiently serious.

If you think you are being bullied or harassed, you may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting. You may feel able to approach the person yourself, or with the help of someone else at the organisation. You should tell the person what behaviour you find offensive and unwelcome and say that you would like it to stop immediately.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the organisation's grievance procedure. In the case of



grievances about bullying or harassment, if it is not appropriate to raise the matter with your line manager, you can choose to raise your grievance with another manager.

All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a fellow worker or trade union official of your choice at any meeting dealing with your grievance. You will be kept informed of the general progress of the process of investigation and, subject to data protection requirements, the outcome of any disciplinary proceedings.

The organisation will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.

You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.

### **Your responsibilities**

Every employee is required to assist the organisation to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination. Special responsibility for practical applications of this policy falls on Directors and Managers involved in the recruitment, selection, promotion and training of employees.

Employees can be held personally liable as well as, or instead of, the organisation, for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the organisation's disciplinary procedure. Conduct of this type will often be gross misconduct which can lead to dismissal without notice.

### **Monitoring and review**

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law. If changes are required, the organisation will implement them.

Richard Arnold (Managing Director)  
On behalf of Omega Supplies Ltd

Date: 5<sup>th</sup> May 2023