

Policy

TFT is an equal opportunity employer and is fully committed to a policy of treating all of its job applicants, employees, clients and stakeholders fairly and in accordance with the provisions of the Equality Act 2010. The Act defines age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation as protected characteristics and this term is used within this policy to refer to these nine elements. Furthermore, TFT will monitor the composition of the workforce and in line with the Act, may introduce positive action where it is deemed to be a proportionate means of achieving a legitimate aim under this policy.

Procedure

- TFT will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without prejudicial regard to their protected characteristics.
- TFT will also take all reasonable steps to provide a work environment in which all are treated with respect and dignity and that is free of any kind of discrimination, harassment, victimisation or intimidation based upon a person's protected characteristics.
- The practice will not discriminate unfairly with regard to protected characteristics.
- Employees and Senior Directors should be aware that TFT is potentially liable for harassment of their staff by people not employed by the Practice. TFT will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Practice, such as clients, customers, contractors and suppliers.
- Every Senior Director and employee has personal responsibility for the implementation of the policy, and a duty to co-operate with the policy to ensure that it is effective in ensuring equal opportunities and in preventing unlawful discrimination, harassment or bullying. Any instance of doubt about the application of the policy, or other questions, should be addressed to the HR Senior Director, as should any requests for special training.
- TFT will regularly review its policies, procedures and selection criteria at all levels to ensure that individuals are treated according to their relevant individual abilities and merits with regard to selection, terms and conditions of employment, transfer, training, promotion, discipline and dismissal.
- Employees and Senior Directors should note that the imposition of a condition or requirement which has an adverse impact on someone, because of their protected characteristic or is more likely to be affected by it, may constitute indirect discrimination and be unlawful, unless it can be justified on grounds of business need. In all such situations, the Senior Director of HR should be consulted.
- Employees and Senior Directors should note that discrimination, harassment or victimisation against someone because they associate with another person who possesses a protected characteristic, or against someone because others think that they possess a protected characteristic, may constitute a breach of the Equality Act and be unlawful.
- Any member of staff who is disabled, or becomes so, should inform the Senior Director of HR so that reasonable adjustments can be made as required.
- TFT undertakes periodic and anonymous surveys of all personnel to assess the perception of equality, diversity and inclusion in all of its offices. Feedback is provided to the Diversity & Inclusion Group, and actions agreed to enable positive change. Feedback to all personnel is also provided with timescales for change.

Application of the Policy

The policy applies to recruitment, the advertisement of jobs, and appointment to them (see below), training, conditions of work, pay, promotion, discipline and dismissal, and to every other aspect of employment.

Promotion and Training

- Once recruited, it is important an employee continues to be treated fairly and be given an equal opportunity to progress and develop within TFT.
- For example, it would be unlawful, to judge two individuals by different standards in an appraisal process on the basis of one of the protected characteristics.
- TFT will ensure that opportunities for training and career development at all levels are made equally available to all suitably qualified employees, basing decisions only on the aptitudes and abilities of the individual and on the requirements of the job.
- The appraisal system and career planning meetings create opportunities for all staff to review and progress their training and development needs.
- TFT can take positive action to encourage staff from underrepresented or disadvantaged groups to come forward for training or development where this is justifiable as a proportionate means of achieving a legitimate aim under this policy.

Pay

TFT will take reasonable steps to offer and monitor pay and reward in line with the provisions of the Equal Pay Act 1970. If a pay difference is due to a condition or practice which applies to men and women but which adversely affects a considerably larger proportion of one sex than the other and it is not justifiable, irrespective of sex, then that condition or practice may be unlawful.

Discipline and Dismissal

- Discipline and dismissal procedures will be followed in line with the staff handbook, and will not discriminate on the basis of an employee's protected characteristics.
- All employees have the right to a fair hearing.
- The policy also applies equally to the treatment of our clients. As part of our client care policy, in our dealings with all other organisations we have regard to our commitment to Equal Opportunities. TFT personnel involved in recruitment in particular should request training if they have any doubt about the application of this policy.
- TFT personnel should contact the HR team if they are in any doubt about the application of this policy.

Training

Ongoing training and implementation occurs via line management, Senior Directors and the induction process for new personnel.

Recruitment

The HR team manages recruitment and are trained to ensure all recruitment procedures are fair and consistent, and in line with TFT's equal opportunities policy. Other staff e.g. line managers involved in recruitment are provided with instructions and/or training in the following areas:

- Use of a bias free person and job specification.
- Language in adverts. All adverts are non-discriminatory and avoid any gender or culturally specific language.
- TFT's statement of commitment to equal opportunities is included on our recruitment site advertising vacancies.

- Recruitment methods. A full range of recruitment methods are used to target a wide pool of suitable candidates; internal recruitment, recruitment agencies, internet, and social media channels such as LinkedIn and Twitter, specialist journals, local schools/colleges.
- Competency-based interviewing and structured interviewing. Interviewers are issued with interview guidelines from HR in line with ACAS and such other appropriate body's recommendations.
- Selecting appropriate candidates by use of standardised questions.
- Where appropriate, skills tests will form part of the interview, and candidates will be notified in advance of these.
- Tests will have been validated in relation to the job by HR, and are in line with TFT's equal opportunities policy. Where relevant, skills tests will be administered by a suitably trained person.
- Planning a good induction, by use of an onboarding timetable and checklist, and a separate induction with the line manager and HR.

TFT understands that recruitment and induction is a continuous process and requires constant monitoring. This also helps ensure the equal opportunities policy is being actively followed, and all candidates whether internal or external receive the same consideration.

Communication of Equal Opportunities Policy

- TFT's equal opportunities policy is communicated to employees through their contract of employment, staff handbook, induction and through the staff intranet, Core. All TFT personnel are notified when there have been any updates or changes to the policy.
- TFT publicly communicates its statement of commitment to equal opportunities externally, e.g. on the internet.
- TFT will update all personnel on changes to legislation and equality and diversity issues as appropriate.

Reporting and Consultation

- TFT has several methods of informing and consulting with personnel, such as :
 - The use of Company wide surveys,
 - The opportunity for anyone to attend the D&I Group meetings,
 - The company intranet invites comments from personnel about any policy, including the equal opportunities policy.
 - The appraisal system is also a forum for employees to ask any queries about the policy, or to raise any concerns.

Monitoring

- TFT regularly reviews its equal opportunities policy and procedures with ACAS, or other appropriate bodies such as CIPD.

Positive Action

- The composition of the workforce and of job applicants will be monitored on a regular basis. Should inequalities become apparent, action may be taken to redress the imbalance, including such measures as advertising jobs on a range of social media channels, and open access jobsites.

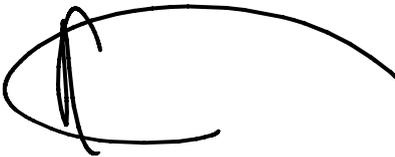
Grievances

- All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily.

- Any member of staff may use the grievance procedure to complain about unfair or discriminatory conduct. In addressing grievances or complaints of discrimination, harassment, or victimisation TFT will not discriminate unfairly on the basis of the protected characteristics of the person making the complaint. The Practice is concerned to ensure that staff feel able to raise such grievances and no individual will be penalised for raising such a grievance unless it is untrue and made in bad faith.

Discrimination, Bullying and Harassment

- Action will be taken under TFT's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this equal opportunities policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal in the absence of mitigating circumstances. TFT personnel should also bear in mind that they can be held personally liable for any act of unlawful discrimination for which they are responsible. Those who commit serious acts of harassment may also be guilty of a criminal offence.

A handwritten signature in black ink, appearing to be 'Christine Keates Lewis', written in a cursive style.

Christine Keates Lewis – HR and Operations Senior Director

For and on behalf of Tuffin Ferraby Taylor (TFT) Ltd

1 November 2023