

Equal Opportunities Policy

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1. Policy Statement

Speedy is committed to encouraging equality, diversity and inclusion among our workforce and eliminating unlawful discrimination. It is our policy to provide equality, fairness and respect for all in our employment and not unlawfully discriminate because of the Equality Act 2010 protected characteristics:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race (including colour, nationality, ethnic or national origins)
- Religion or Belief (including political opinion and lack of religion or belief)
- Sex
- Sexual Orientation

*The Republic of Ireland Employment Equality Act 1998 refers to the following protected characteristics; Gender, Civil Status, Family Status, Sexual Orientation, Religion, Age, Disability, Race and Membership of the Traveller Community.

We are opposed to and avoid all forms of unlawful discrimination, including in recruitment and selection, pay and benefits, terms and conditions, promotion, training and career development, dealing with grievances, discipline, dismissal, redundancy, leave for parents or requests for flexible working. We will also make reasonable adjustments wherever required to provide disabled people with a fair chance to access employment opportunities.

All employees have a duty to act in accordance with this Policy and treat colleagues with dignity at all times, and not to discriminate against or harass another person, regardless of their status.

2. Scope

The Equal Opportunities Policy applies to all those who work, worked or apply to work for the Company, including:

- Permanent employees (full and part time)
- Contract workers
- Agency workers
- Trainee workers and students on work experience or placements
- Volunteers
- Former employees
- Consultants
- Fixed-term employees
- Interns
- Casual workers

It also extends to apply to the way in which employees treat visitors, clients, customers, suppliers and members of public.



3. Group Policy

Speedy is an Equal Opportunities Employer. We recognise that the provision of equal opportunities in the workplace is not only good management practice; it also makes sound business sense. Our Equal Opportunities Policy will help all those who work for us to develop their full potential and talents. The resources of the workforce will be utilised fully to maximise the efficiency of the organisation. However, it is only possible to achieve this when we have equal opportunities for all.

The purpose of the Policy is to communicate the commitment of the Chief Executive and Senior Management Team.

In addition, each Manager is accountable for delivering the equality commitments in their areas of responsibility and all employees are expected to abide by the Policy and to act in accordance with its objectives so as to remove any barriers to equal opportunity.

4. Responsibilities

4.1 Employees

All employees are expected to conduct themselves in a professional and considerate manner at all times and comply with this Policy. Employees should promote equality and equal opportunities, foster good relations between people with different protected characteristics and to prevent and eliminate discrimination. Employees are encouraged to act if they witness any form of discrimination, victimisation or harassment.

4.2 Managers

Managers are responsible for implementing the Policy as part of their day-to-day role and applying the Company Policies and Procedures in a fair and consistent way. This includes (but not limited to) recruitment and selection processes, supervision and management, performance review and promotion. Managers should ensure any equality and diversity issues are addressed promptly such as accommodation of reasonable adjustments for a disabled employee or considering a flexible working request. Any issues relating to potential discrimination, victimisation or harassment including employees, customers, suppliers or the general public should be dealt with without any reasonable delay.

4.3 Human Resource Team

The HR team are responsible for developing employment policy and strategy relating to equality and diversity. Ensuring the Policy is followed and applied fairly, providing advice to Managers and employees. Coaching and supporting Managers in accommodating reasonable adjustments and facilitating meetings to resolve any matters relating to discrimination or harassment. They are also responsible for monitoring and updating HR policies and procedures.



4.4 Recruitment Team

The Recruitment team together with the Recruiting Managers are responsible for ensuring the recruitment and selection process is fair and does not discriminate either directly or indirectly; consciously or unconsciously. They should ensure that any reasonable adjustments are accommodated to enable the candidates' participation in the process. Procedures should be reviewed regularly to ensure that individuals are treated fairly.

4.5 Learning and Development Team

The L&D team need to ensure equality and diversity awareness is included in the induction process. Facilitating training and development initiatives on equality and diversity such as eLearning, both at corporate and team level.

4.6 The Chief Executive and the Executive Board

The Senior Management Team provides leadership on the equality and diversity strategy and policy. They act as overall champions to ensure the Policy is implemented, communicating the strategy and policy, internally and externally. They ensure the Company is an Equal Opportunities Employer.

5. Equal Opportunities

Equal Opportunities means ensuring we prevent:

- Direct discrimination (deliberately treating some people less favourably than others)
- Indirect discrimination (having arrangements which indirectly result in discriminating against certain groups or individuals)
- Victimisation of people
- Harassment of people (please refer to our Anti-Harassment and Bullying Policy)

6. Discrimination

Unlawful discrimination occurs in the following circumstances.

6.1 Direct Discrimination

Direct discrimination occurs when one individual treats or would treat another individual less favourably on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs ("the protected characteristics").

For example, a Chinese applicant for a senior post is not appointed because he might not "fit in" with the existing (all white) team.



6.2 Discrimination by Association

Discrimination by association occurs when an individual directly discriminates against another individual because they are associated with a person who possesses a protective characteristic.

For example, an individual may be subjected to harassment by their colleagues because they are married to someone who is Catholic. The harassment is on the basis of their partner's religion and not the individual's own beliefs.

6.3 Discrimination by Perception

Discrimination by perception occurs when an individual directly discriminates against another individual because they think they possess a protective characteristic. For example, where an individual rejects a male applicant for a job following an interview on the basis that they thought the applicant was gay.

6.4 Indirect Discrimination

Indirect discrimination occurs when an individual's employment is subject to an unjustified condition, criteria or practice which a group of people with certain protected characteristics finds more difficult to meet when compared to others without the characteristics in the group. Although on the face of it the conditional requirement is "neutral" and applies to everyone.

For example, a job advert says applicants must have spent 10 years working in retail. By doing this the business could be discriminating indirectly based on age. This is because the advert excludes young people who may still have the skills and qualifications needed.

7. Harassment and Victimisation

7.1 Harassment

Harassment is prohibited. Harassment is unwanted conduct related to a protected characteristic, with the purpose or effect of violating a person's dignity and /or creating an intimidating, hostile, degrading, humiliating or offensive environment. It may be directed towards one or more individuals. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

7.2 Victimisation

Victimisation is also prohibited. This is less favourable treatment of someone, or subjecting someone to a detriment, who has (or is believed to have) complained or given information about discrimination or harassment, or supported someone else's complaint.

8. Recruitment and Selection

We aim to ensure that no job applicant suffers discrimination because of any protected characteristics. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.



Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants should be done by more than one person wherever possible.

Job advertisements will be normally widely publicised so as to encourage applications from a broad range of suitable candidates from all backgrounds.

In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (such as accessible interview rooms or the assistance of a sign language interpreter) will be offered to enable such candidates to compete on an equal basis.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the HR team or the UK Border Agency.

To ensure that this Policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure.

Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymous format solely for the purposes stated in this Policy.

Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

Applicant details will be stored in our system only as long as required for the purposes of the recruitment and/or on-boarding processes in line with GDPR legislation.

9. Training and Promotion

We are keen to ensure that development opportunities are available to all employees, in keeping with fair assessment of potential and business needs. Employees should be actively involved in the assessment of their own training and development needs primarily through regular One to Ones with their Line Manager. Selecting employees for internal promotion involves very much the same principles and procedures as external selection. Bias-free criteria, testing and interviewing procedures are needed. Promotion decisions should be based firmly on the assessment of individual employees against job-related criteria, avoiding all generalised and discriminatory assumptions.

10. Disability Discrimination

A disability is defined as 'a physical or mental impairment that has a substantial and long term adverse effect on an individual's ability to carry out normal day to day



activities'. If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

The Company will comply with its obligations and will make reasonable adjustments to seek to overcome any practical difficulties that may prevent an applicant with a disability from taking up employment with us.

If you experience difficulties at work because of your disability, you may wish to contact your Line Manager to discuss any reasonable adjustments that would help overcome or minimise the issue. Your Line Manager may wish to consult with you and your medical adviser(s) or Occupational Health about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

11. Breaches

If you believe you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure.

There are both formal and informal stages to our Grievance Procedure and we would always encourage those wishing to make a complaint to do so informally initially unless their complaint is of a severe nature in which case it may be appropriate to proceed straight to the formal stages.

11.1 Informal Steps

If you feel that you or others are being harassed, victimised or treated in a way that breaches this Policy you should (if you feel able to do so) tell the person straight away that the behaviour in question is offensive, unwanted and that you want them to stop.

Alternatively, you may prefer to write to the person concerned keeping a dated copy of the letter or ask a colleague or employee representative to speak to that person on your behalf. A note should be kept of the date and what was said by all involved. This may be needed as evidence should harassments or victimisation continue or subsequently reoccur. This is often enough to resolve the situation particularly if the person involved was unaware that the behaviour was causing offence.

Any informal approach to an assisting employee will be treated as completely confidential and will not result in any report to anyone within the Company unless the employee agrees.

If you prefer, particularly where you would find it too difficult or embarrassing to take up the matter yourself, a work colleague will participate in an information meeting between you and the individual concerned or will, at your request, approach the individual on your behalf.

The informal stage will not result in any formal internal investigation or disciplinary action but is intended to enable the employees to resolve the matter themselves without it going any further.



If you consider that you may have been subjected to conduct amounting to a criminal offence you are entitled to seek the assistance of a colleague to accompany you to make a formal complaint to a police officer or to provide you with any assistance that you may require.

11.2 Formal Steps

At any time whether or not informal steps have been taken, any employee who feels that they or others have been harassed or victimised or treated in a way that breaches this Policy can raise the matter directly with their Manager, either verbally or in writing. Thereafter, the matter will be dealt with in line with the Company's formal Grievance Procedure.

Allegations regarding potential breaches of this Policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under the Company Disciplinary Procedure.

Any employee who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this Policy.

12. Legal Framework

- The Equal Pay Act 1970
- The Human Rights Act 1988
- The Equality Act 2010
- The Asylum & Immigration Act 1996
- GDPR