Equal Opportunities Policy

1. Purpose

The Company values and is committed to promoting equality and diversity within the workplace by seeking to ensure that all individuals are treated fairly with dignity and respect and by recognising and encouraging individual contribution within the organisation.

The Company will provide a working environment in which employees can realise their full potential and contribute to its business success irrespective of their gender, race, disability, sexual orientation, marital status, part time status, age, religion or belief (Protected Characteristics).

It is also our policy that all employees should be allowed to work in an environment free from harassment, bullying or unsolicited or unwelcome comments or overtures on discriminatory grounds. This is a key employment value to which all employees are expected to give their support.

2. Reference Documents

- Equality Act 2010
- Excalon Recruitment and Selection Policy (HR002-recruitment)
- Excalon Pre-Employment Policy (HR003-pre-employment)
- Excalon Ethics Policy (HR015-Ethics)
- Excalon Training and Development (HR014-Training)

3. Policy

Specifically, the Company aims to ensure that no employee or candidate is subject to unlawful direct or indirect discrimination. Discrimination against people will mean (but is not limited to) any of the following; on grounds of gender, age, race, pregnancy, colour, nationality, ethnic and national origin, sexuality/sexual orientation, religion and belief, disability, marital status or because they are a member of a trade union, work part time or are on a fixed-term contract. This policy applies equally in all circumstances. This commitment applies to all aspects of employment, including:

- Recruitment and selection, including adverts, job descriptions and selection procedures
- Training and development
- Promotion and career development opportunities
- Terms and conditions of employment, and access to employment benefits and facilities
- Grievance handling and the application of disciplinary procedures
- Selection for redundancy.

Excalon will not tolerate unlawful discrimination, harassment, bullying, victimisation or abuse of employees in the working environment or those connected with the services provided by Excalon and will take positive action to prevent its occurrence.

Types of Discrimination

Direct discrimination is where an individual is treated less favourably than another due to having a protected characteristic and is put at a disadvantage on discriminatory grounds in relation to their employment. Direct discrimination may occur even when unintentional.

Perceptive Discrimination is a direct discrimination against someone who believe it relates to a relevant characteristic even when it does not.

Associative Discrimination is a direct discrimination against someone because they associate with an individual who has a protected characteristic.

Indirect Discrimination is where a Company policy or practice applies to all employees but particularly disadvantages a specific group or people who have a certain protected characteristic.

Victimisation occurs where an individual is treated less favourably because they have made or supported a complaint, or they have raised a grievance and asserted their statutory rights or have assisted a colleague with information relating to a grievance. The grievance may have been resolved however the employee is subsequently excluded by his peers, because he has submitted a grievance. This is the basis for his claim of victimisation.

Harassment is unwanted conduct based on discriminatory grounds which might reasonably be considered to affect the dignity of an individual at work or to create an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may be visual, verbal, non-verbal or physical behaviour that is unwanted and personally offensive to the recipient and may cause the recipient to feel threatened, humiliated, intimidated, patronised, bullied, distressed or generally harassed.

The distinction between bullying and performance management

It is sometimes difficult to define bullying or the boundaries between management style and bullying. However, the Company does not condone bullying as an acceptable management approach. If complaints are made, those investigating the complaint may have to make a judgement call about whether the behaviour was bullying.

The application of reasonable pressure to meet targets or tight deadlines, or delivery of constructive criticism designed to help a colleague develop and improve in the future is appropriate. This is distinct from personal criticism, abuse or derogatory remarks, either in public or in private, which humiliates the individual and undermines their self-esteem, which could amount to bullying.

Handling Complaints of discrimination and harassment

Discrimination and harassment are often complex matters, and there is no single way of dealing with every suspected or alleged instance. In some cases, employees may be able to deal satisfactorily with an issue by raising it with their immediate manager.

If an employee wishes to make a formal complaint, he or she should use the Company's Grievance Procedure which is set out in the grievance policy and procedure.

The Company will treat seriously all allegations of unlawful discrimination or harassment.

Being Accused of Discrimination or Harassment

If an employee is accused of unlawful discrimination or harassment, the Company will investigate the matter fully. During the investigation the employee will be given the opportunity to respond to the allegation and provide an explanation of his or her actions.

If the Company concludes that no unlawful discrimination or harassment has occurred, this will be the end of the matter. If the Company concludes that the claim is false or malicious, the complainant may be subject to disciplinary action.

If on the other hand the Company concludes that the employee's actions amount to unlawful discrimination or harassment he or she may be subject to disciplinary action, up to and including summary dismissal for gross misconduct.

4. Records Management

All employees must maintain all records relevant to administering this process and procedure in line with Legislative and the company record keeping system.

5. Policy Review

The Company will monitor its policies, processes and procedures in order to implement changes to improve them and ensure that they comply with best practice, legislation changes and the emerging marketplace.

6. Version History

Version History: HR001 Equal Opportunities Policy			
Document Version	**Version Date**	**Revision Description**	**Author**
0.1	01/09/2015	Initial	Katrina Beck
0.1	01/09/2016	Annual Review - No Change	Katrina Beck
0.1	01/07/2017	Annual Review - No Change	Laura Henshaw
0.2	01/08/2018	Annual Review – Minor changes	Katrina Beck
0.2	01/11/2019	Annual Review – No Change	Katrina Beck
0.2	30/06/2021	Annual Review – No Change	Katrina Beck
0.2	08/08/2022	Annual Review - No Change	Katrina Beck
0.2	01/09/2023	Annual Review – No Change	Katrina Beck

DISTIRUBITON LIST		
Name	**Role**	**Location**
Company Wide	Employees	All Offices

Signed on behalf of Excalon Ltd: _____ Kevin O'Donnell | Managing Director