EQUAL OPPORTUNITIES

1. INTRODUCTION

The purpose of this policy is to state the Company's commitment to equal opportunity and to establish how this will be put into effect. The policy represents the Company's response to statutory requirements and good practice recommended within the Codes issued by the Commission for Racial Equality and the Equal Opportunities Commission.

2. GENERAL POLICY STATEMENT

- 2.1. The Company is committed to the principle of equal opportunities in employment. Its aim is to ensure that a job applicant or employee receives no less favourable treatment on the grounds of gender, disability, marital status, religion, colour, race, nationality, cultural or national origins, age or sexual orientation or is placed at a disadvantage by requirements or conditions which cannot be shown to be justifiable. It is also designed to create equality of opportunity for employment within the Company.
- 2.2. Operational policies and procedures will be kept under review to ensure that they do not promote direct or indirect discrimination. All employees will be given equal opportunity and facilities.

3. RESPONSIBILITIES

3.1. Company

To ensure the existence of an equal opportunities policy.

3.2. Managers & Supervisors

In addition to their responsibilities as employees, all managers and Supervisors are required to ensure that :-

- All employees are aware of their responsibilities under the policy.
- The policy is implemented throughout their sphere of responsibility.

3.3. Employees

- To co-operate with the measures introduced to ensure equal opportunity.
- To ensure that they do not discriminate or induce others to practice unlawful discrimination, to refrain from harassment, abuse, intimidation or victimisation of individuals.

3.4. Management

- To oversee the introduction, operation and monitoring of the policy.
- To ensure the provision of appropriate training & guidance material.
- To ensure that the collection and submission of information on job applicants and employees for monitoring purposes.
- To review procedures and monitor selection decisions.
- To ensure the provision of training & information to managers and staff on the operation of the policy.

4. RECRUITMENT PROCEDURES

- 4.1. Advertising & recruitment literature must not imply that there is a preference for one group of applicants, e.g. by the use of discriminatory job titles or material depicting only members of a certain sex/racial group unless this is a genuine occupational requirement in terms of the current legislation. Advertising and recruitment drives should be aimed at as wide a group as possible of suitably qualified and experienced people.
- 4.2. Applicants will be monitored with regards sex and racial group and if one group is proportionately under represented in particular work, the Company may give special encouragement to and provide specific training for that. The information will be collected anonymously.
- 4.3. It is the responsibility of the Management to monitor advertising and recruitment practices to ensure compliance with these requirements.
- 4.4. Appointing officers should be able to identify the need for particular job requirements and the criteria on which short-listing. Where such requirements or criteria on which short-listing will have the effect of reducing the likelihood of an appointment from a particular sex or racial group they must be justifiable as essential for the effective performance of the job.
- 4.5. Selection procedures must be conducted on an objective basis and relate only to the applicants suitability for the job. Managers must guard against pre-conceptions that individuals of a particular sex, race or marital status possess characteristics which could make them unsuitable for employment.
- 4.6. A brief record of the reason(s) for rejection / short-listing / appointments should be made for each applicant.

5. TRAINING & DEVELOPMENT

- 5.1. Positive steps will be taken to ensure that no individual is discounted from training and employee development opportunities on grounds of sex, marital status, religion, age, colour, race or nationality.
- 5.2. Training provision should be made where necessary to assist the return to work of individuals following a break for domestic reasons. Age limits for entry to training schemes should not be unnecessarily restrictive to exclude certain group of staff.

5.3. All key personnel involved in management and selection will be given guidance/training in the Company's policy and the law.

6. PART-TIME WORKING

6.1. The Company will look to grant requests for part-time work on the individual merits of each case but retains the right to refuse such requests should the efficient operation of the role and function be compromised.

7. TERMS & CONDITIONS

7.1. The Company will not discriminate on the basis of sex, race, marital status, age, religion, colour, nationality, cultural or national origins in the application of local conditions (e.g. allocation of duties or shifts between staff employed in the same capacity) except where such duties are specifically covered by Health & Safety legislation.

8. PERSONNEL/HUMAN RESOURCE POLICIES

8.1. The Company will ensure that all other agreed personnel/human resource policies and conditions of service are applied equally.

9. DISCIPLINARY & GRIEVANCE PROCEDURES

- 9.1. Direct Discrimination will be treated as a disciplinary matter and will be dealt with under the Company's Disciplinary Procedure.
- 9.2. Employees who feel they may have been subjected to discrimination contrary to this policy should pursue this through the Grievance Procedure.
- 9.3. Any individual outside the Company's employment who has a complaint of discrimination should make this in writing to the Human Resources Department.

10. MONITORING EQUAL OPPORTUNITIES

- 10.1. To facilitate monitoring on a Company wide and local basis, information on the sex and cultural origins of existing and job applicants must be collated. Data collected for this purpose will be solely used for that purpose.
- 10.2. Monitoring will be undertaken by the Human Resources Department in accordance with Section 3 of the policy.

11. IMPLEMENTATION

11.1. The Company is committed to making this policy effective. Implementation will require preparation, phasing and on going programmes of training, monitoring and review.

11.2. Publicity

A copy of the policy will be provided to all managerial and supervisory staff who have responsibility for the appointment of staff.

Existing staff will be given the information on the intent of the policy and their responsibilities via staff briefing sessions.

Training 11.3.

Staff attending management training programmes will be made aware of the policy and their responsibilities.

Signed:

Philip Davison Sebry
Managing Director
24 February 2010