

**CONTROLLED DOCUMENT**

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Date:

**EQUALITY  
AND  
DIVERSITY  
  
POLICY**

**For**

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**FRANKHAM CONSULTANCY  
GROUP LTD**

## 1.0 INTRODUCTION

- 1.1 As a service-led organisation Frankham Consultancy Group Limited ("The Company") has a moral obligation to respond to the wide social diversity in our local communities and reflect this in our own organisational culture. We strive to achieve this through our values and the actions created from these values. The Company also recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.
- 1.2 Our customers include residents from households with higher than average proportions of people who experience discrimination in the housing or job market. The main groups include: people from black and minority ethnic (BME) communities; households headed by women (especially lone parents); people with disabilities; older people, people with learning difficulties, same sex or people who identify as trans-gender.
- 1.3 The Company is committed to providing an environment in which:
- (a) All persons, whether employees (actual or prospective) are treated with equal dignity, respect and fairness;
  - (b) No person shall be unlawfully discriminated against, either directly or indirectly, on the grounds of their sex, marital status, racial, ethnic or national origin, religion, sexual orientation, age or disability; and,
  - (c) No person shall be victimised or harassed on any of the above grounds.
  - (d) No person shall be treated as a slave or made to perform forced or compulsory labour.
- 1.4 **Financial implications** Each year within the business planning process, the Company will ensure that sufficient funds are made available to deliver training for managers in the conduct of the policy and where necessary for a review of its operation.
- 1.5 **Organisational structure and supply chain** The Company is absolutely committed to preventing modern slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking. We will take actions to understand all potential modern slavery risks related to our business and put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chains.

## 2.0 PURPOSE

- 1.1 The purpose of this Policy is to set out the standards which employees are entitled to receive and obliged to give. All employees shall be bound by this policy.

## 3.0 SCOPE

- 3.1 The Policy is applicable to all Frankham Consultancy Group Limited employees.

- 3.2 This policy shall be applied equally in the advertisement of jobs, recruitment and selection, training, promotion, pay and other benefits, hours of work and all other aspects of employment.
- 3.3 This Policy will also apply to all persons having responsibilities which relate to and necessitate their presence and the execution of their duties within the areas of the Group works / premises. These persons include the employees of Sub-contractors, Consulting Practices and the Client plus Self-employed persons.

#### 4.0 DEFINITIONS

For the purposes of this policy the following definitions apply:

- 4.1 **Direct discrimination** occurs where individuals are treated less favourably than others on grounds of their sex, marital status, race, ethnic origin, or disability. Direct discrimination may be unintentional.
- 4.2 **Indirect discrimination** occurs where individuals, to their detriment, are made subject to a provision, criterion or practice, which, although apparently neutral, is such that a significantly lower proportion of people of one sex or race can comply with it than people of the opposite sex or an alternative race.
- 4.3 **Victimisation** occurs where individuals are treated less favourably than others because they have asserted, or assisted others in the assertion of, their statutory rights. Victimisation is also a disciplinary issue: employees will not be victimised for making a complaint and should not be deterred from making one for fear of repercussions.
- 4.4 **Harassment** covers a range of unsolicited behaviour which, whether intentional or not, creates feelings of unease, humiliation, intimidation or discomfort, causes offence, exclusion or withdrawal or threatens or appears to threaten job security. The following are examples of harassment and form a list that is not exhaustive:
- Physical contact ranging from touching to serious assault
  - Verbal and written harassment through offensive language, jokes/songs, gossip or slander
  - Visual displays or circulation of offensive posters, graffiti, obscene gestures
  - Isolation and non co-operation at work, exclusion from social activities
  - Coercion, ranging from pressure for sexual favours to pressure to participate (or cease to participate) in political, religious or social groups
  - Intrusion by pestering, spying and following
  - Bullying by exerting undue pressure of a verbal or physical nature on individuals to undermine their position in the eyes of colleagues

- Intrusive questioning about a person's ethnic origins, marital status, sexual orientation or other factors related to equality issues

4.5 **Bullying** includes criticism and personal abuse, either in public or private, which humiliates or demeans the individuals involved. This behaviour can include:

- Abusive language
- Persistent unfair criticism
- Continually ignoring or excluding an individual
- Setting objectives with unreasonable deadlines
- Offensive gestures and behaviour
- Unwelcome physical contact

4.6 **Slavery** occurs when individuals are treated as slaves or made to perform forced or compulsory labour. A person commits an offence if the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

## 5.0 OBJECTIVES

5.1 Paragraph 46 of the terms and conditions of employment to which all employees are contractually bound provides that it is an express condition of employment that employees familiarise themselves with the Company's Equality and Diversity Policy and take such steps as are reasonably practicable to comply with its provisions. The Company is committed to ensuring that customers, job applicants, and employees are treated fairly and with dignity, and without any unlawful discrimination. All employees have the right to be treated fairly and with dignity. They also have a duty to treat other employees in the same manner. Unlawful discrimination, harassment, or bullying is a serious disciplinary offence.

5.2 The Company constantly works towards Equality. Our aim is to ensure equality and equity of treatment in respect of for employment, promotion, training and to ensure employees are treated on the basis of merit, ability and potential regardless of colour, race, nationality, ethnic or national origin, disabilities, religion, age, politics or sex (which for these purposes includes gender, marital status, parenthood and number of children, and sexual orientation), or any other ground not relevant to good employment practice. We take a similar view on age, subject to the requirement to retire at the appropriate age.

## **RESPONSIBILITY**

### **6.0 EMPLOYER'S RESPONSIBILITIES**

- 6.1 To ensure that, in all respects, the recruitment, selection, discipline, promotion and training of employees complies with this policy and are influenced only by valid considerations of merit, ability and suitability.
- 6.2 To monitor the implementation of this policy, including the outcome of disciplinary or grievance procedures and the handling of recruitment, selection and promotion.
- 6.3 To update or revise this policy if and when necessary and to inform employees of any changes.
- 6.4 To ensure that all employees and, in particular, managers are made aware of this policy, and responsibilities under it and, where required, to provide appropriate training.
- 6.5 To ensure a person's legal status to work and reside in the UK when they join the company as an Employee.
- 6.6 To ensure that all recruitment agencies we use are required to provide written evidence of procedures they have in place to ensure that the candidates they submit can legally work and reside in the UK and have not been subject to abuse of Slavery or Human Trafficking.
- 6.7 To ensure all our suppliers go through our established approved supplier process. Suppliers are required to provide written evidence through their Policies that they explicitly operate a business that does not engage in Slavery or Human Trafficking.

### **7 EMPLOYEES' RESPONSIBILITIES**

- 7.1 Senior Management is committed to the principles outlined in this Policy. It has to be emphasised, however, that the successful operation of the Policy depends on all employees giving it their full support.
- 7.2 At all times, to ensure that this policy is put into practice and when acting in the course of their duties, on company business or on company property.
- 7.3 Where employees perform a supervisory function, or otherwise if reasonably practicable, to ensure that their colleagues adhere to this policy and, in any event, inform management of any breaches of this policy, whether or not by a fellow employee.
- 7.4 Line managers must take all reasonable steps to prevent harassment happening in the workplace and take appropriate action if it occurs, and

must ensure that complaints related to harassment are handled quickly, with sensitivity and in a strictly confidential manner

- 7.5 Employees working with other organisations and individuals who they feel are acting contrary to this Policy should inform the organisation or individual of their concern and seek advice on the most appropriate course of action from their Manager.
- 7.6 Employees who feel under stress at work, or whose workloads are becoming unmanageable should seek the assistance of their supervisors. There is nothing wrong in asking for help. On the other hand, it is wrong to react to overload by trying to bully subordinates into doing more.
- 7.7 All employees have a responsibility to make sure they understand the values and benefits of equality and diversity.

## **8.0 COVERAGE**

- 8.1 This Policy applies to the treatment of employees by employees. Although people who are not employees may not use the provisions of this Policy, its principles of fairness and courtesy also apply to the treatment of people who are not employees. These may include clients, visitors, job applicants, tenants, or central or local government officials.

## **9.0 BEHAVIOUR EXPECTED**

- 9.1 Employees are not expected to act in an exaggerated or formal manner, but rather in a professional, friendly, helpful, and efficient manner. This applies whether contact is made face-to-face or by telephone, letter, or email. Be aware, however, that while facial expression, body language and tone of voice make it much harder for misunderstandings in face-to-face conversations, telephone conversations use tone of voice and words only. Because letters use words alone, it is all the more important to choose them carefully. Email needs particular attention, since such communication usually takes the form of a speedy response, short and to the point. Particular care should be taken to ensure that e-mail messages do not come across as being rude.
- 9.2 It is not the intention to impose upon employees a different philosophy on life, any more than the Company's no-smoking policy intends to stop employees smoking. The objective is rather to establish acceptable levels of behaviour while at work.

## **10.0 TRAINING**

- 10.1 All employees will receive training appropriate to the post they hold. They may need further training if they change jobs within the Company. Training can be by means of a simple in-house meeting or by an introductory chat from a supervisor. More elaborate training will usually be carried out in-house. Any additional training needs will be identified at

appraisal. Employees who feel that such training might be useful before then should discuss the matter with their line manager.

- 10.2 In particular, the Company aims at a consistent approach in recruitment, appraisal, and in handling disciplinary, grievance, and harassment issues. Employees who can be expected to deal with such issues will receive appropriate training.

## **11.0 MONITORING**

- 11.1 Monitoring provides the quality control of the Policy, and the Company needs basic information if it is to ensure that the Policy is working as it ought. We keep records of sex, race, and disability, age and faith. Information about the disabilities of individual employees is used to help us take all reasonable steps to ensure that they are able effectively to do their jobs. With that exception, monitoring information will be used for monitoring purposes only.

We gather information on the diversity of our workforce, employees trained, disciplined, transferred, promoted, applying, starting or leaving so that data can be compared and analysed against data on i) other groups of employees in our company, ii) jobseekers in the local community to each of our offices and iii) the national labour market.

This will help us identify significant differences between comparative groups or identify trends over periods of time and if they occur, we will find out why. It is important that third party recruitment agencies supply their applicant monitoring for each Frankham assignment in order to maintain accurate data.

## **12.0 LANGUAGE**

- 12.1 Language used in official communication should reflect the letter and spirit of this Policy. Choosing the right words is not simply a matter of paying lip service to political correctness but is about a style of communication which does not exclude individuals or cause offence. While it is important to be sensitive to language, it is equally important not to avoid discussing necessary topics because of uncertainty over which words to use. It should be stressed that we are all learning and improving, and that no-one has to fear being penalised for mistakes made in good faith. Disciplinary action will result only where language is used in a deliberately negative way to bully, taunt or harass.
- 12.2 Some general guidelines on language are:

- Avoid the use of stereotypes and where possible use gender neutral language (partner instead of boyfriend/girlfriend). Do not make assumptions about whether individuals will be able to attend and perform the duties of their posts: openly discuss these matters with them.

- Unless you really mean to refer to one sex (eg maternity leave), try to use gender-neutral language (e.g. “employees may take their holidays” rather than “an employee may take his holiday” or “an employee may take their holiday.”)
- Please recognise that individual personal characteristics are far more important than a disability or a medical condition, e.g. “employees with disabilities” rather than “disabled employees.”

### **13.0 VULNERABLE CUSTOMERS**

- 13.1 The Company is committed to the protection of vulnerable adults and children. We are confident that our employees, by their conduct and by the example they set, will comply with the highest standards of equal opportunities.
- 13.2 Generally, we can expect the customer to inform us if any of our employees need to be in contact with vulnerable end-user customers, especially where work requires entry into private homes. Project Managers should also keep an independent watching brief.
- 13.3 If you are required to be in contact with vulnerable end-user customers, the Company will pay to have your records checked by the Disclosure and Barring Service (DBS). The DBS report will be kept in a sealed envelope on your personal file and will be examined only for the purposes for which it was obtained. You will suffer no detriment should spent convictions be disclosed which have no bearing on working with vulnerable people. A spent conviction that disqualifies you from such work will have no effect on your continued employment if alternative work is available.
- 13.4 When dealing with vulnerable adults and children, the general principles of this policy should apply: you are not expected to act in an exaggerated or formal manner, but rather in a professional, friendly, helpful, and efficient manner.

### **14.0 HARASSMENT**

- 14.1 Harassment is bullying. Such behaviour is inconsistent with the Equality and Diversity Policy. The expression “harassment” refers to any conduct related to disability, race, colour, religion, nationality, ethnic origin, gender, sexual orientation, marital status, or any other personal characteristic, and which is unwanted by the recipient or affects the dignity of any individuals or groups of individuals at work. In all cases harassment is a disciplinary matter and, in serious cases, it may amount to a criminal offence.
- 14.2 Harassment may be intentional or unintentional. The key issue is whether it is unwanted by the recipient. Common sense will be your guide in most cases. Bear in mind that people vary in their sensitivity to such matters. Be ready to respond positively and sensitively if a colleague complains

about your words or actions. Similarly, be ready to tell others if their words or actions offend you.

- 14.3 It is not possible to define every possible instance of harassment. It may be, for instance, that two colleagues enjoy bantering about the football teams of their respective countries: this is fine. But if someone continues to comment disparagingly when the colleague feels offended or hurt, that is another matter. The broad guideline is that joking is funny only if everyone is laughing.

## **15.0 DISCIPLINARY ACTION**

- 15.1 Disciplinary action shall be taken against any employee who is found to have committed a serious or repeated breach of the Equality and Diversity Policy or an act of harassment or bullying.
- 15.2 While mistakes made in good faith will not result in disciplinary action, such action will result if the employee does not respond positively to an informal approach.
- 15.3 There will be no victimisation of an employee who makes a complaint against harassment.
- 15.4 Because of the serious nature of such an accusation, it is a disciplinary offence to bring such a charge against a fellow employee knowing it to be untrue and acting maliciously or recklessly.

## **16.0 COMPLAINTS PROCEDURE**

- 16.1 The intention is to encourage improvement rather than penalise, and we hope that most problems can be settled informally. If informal discussion does not have the desired effect, or if the matter is more serious, the formal disciplinary procedure will apply.
- 16.2 If you believe that you are being harassed, the first step is to ask the person responsible to stop. If you feel too embarrassed to do so, you may wish to make an approach accompanied by a colleague, make a written approach, or ask your immediate line manager (or the next person above if it is the line manager who is the subject of complaint) for assistance. The Personnel Manager is always ready to discuss any such problem with you in confidence and to help the matter to proceed.
- 16.3 If the conduct continues, you should then lodge a formal complaint. It is important to report the matter as a formal complaint as soon as possible to prevent the situation deteriorating further. In such a case, you are advised to keep a diary of incidents, noting dates, times, places and any witnesses to the harassment.
- 16.4 You should make your formal complaint in writing to your immediate line manager (or the next person above if it is the line manager who is the

subject of complaint). The Personnel Manager is always ready to discuss any such problem with you in confidence and to help the matter to proceed.

- 16.5 There will then be a formal disciplinary interview. While it is usually the subject of the disciplinary hearing that may be represented by a fellow employee or trade union representative, in a case of alleged harassment, you may also be represented if you wish. Both you and the person against whom you are complaining will have the right to give evidence, call witnesses, and test the other person's case by questions.
- 16.6 All complaints will be handled quickly with sensitivity and in a strictly confidential manner. Under normal circumstances this will be within five working days and you will be kept informed of the progress at all stages.