

EQUAL OPPORTUNITY AND DISABILITY DISCRIMINATION POLICY

Introduction

Dawnus recognises the merits of developing a workforce that incorporates the many diverse skills and backgrounds available from within the total population and accordingly, will strive to become an organisation that recognises, values and understands diversity and provides its employees with genuine opportunities to improve and reach their full potential.

Dawnus is committed to making every effort to ensure that staff and job applicants are treated with courtesy, dignity and respect irrespective of:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marital or civil partnership status;
- Pregnancy or maternity;
- Race (including colour, ethnic or national origins and nationality);
- Religion or belief;
- Sexual orientation.

These are referred to throughout this policy as “protected characteristics”.

Our aim is to ensure that individuals are treated fairly and equally and this policy supports the Company objective of providing a working environment free from all forms of discrimination.

The company will not unlawfully discriminate in the arrangements we make for recruitment and selection, or in the opportunities afforded for employment, training or any other benefit. All decisions will be made fairly and objectively. We aim, as far as reasonably practicable, to ensure that all our working practices are applied fairly and consistently and, where necessary, we will take reasonable steps to avoid or overcome any particular disadvantage these may cause and to promote equality.

Scope

The scope of this policy and its associated ways of working goes beyond immediate colleagues and encompasses:

- All existing employees;
- All potential employees;
- Sub-contractors;
- Workers (as defined by employment legislation, and including agency temps);
- Partners;
- The self-employed.

The HR Director has overall responsibility for Equality, Diversity and Inclusion and will action as Diversity Champion. The HR Department is responsible for the effective operation of this policy, ensuring compliance with discrimination law and for ensuring that all employment-related policies, procedures and practices adhere to this policy.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy. Managers will be given appropriate training on diversity and inclusion awareness.

All employees have a responsibility not to discriminate against or harass other colleagues and to report any such behaviour of which they become aware.

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Policy Objectives

- To create a working environment free from discrimination, harassment, victimisation and bullying;
- To have a workforce that represents and responds to the diversity of our customers and society in general;
- To provide a fair working environment in which discrimination will not be tolerated;
- To work towards finding ways for underrepresented groups to fully realise their potential within the Company;
- To reduce staff turnover, absenteeism and sickness levels;
- To improve safety and quality provided by a balanced and productive workforce;
- To ensure that all applicants are treated fairly during recruitment processes and in accordance with relevant legislation and Codes of Practice;
- To regularly review procedures and selection criteria for promotion to ensure that individuals are selected and treated according to their relevant individual abilities and merits.

Principles

It is unacceptable for any applicant, employee, worker, supplier or member of the public to be discriminated against, either directly or indirectly, because of any protected characteristic.

Dawnus takes any breach of this policy seriously and a breach could lead to formal disciplinary action being taken, which in some cases could lead to dismissal in accordance with the Disciplinary Procedure.

Training, Communication and Awareness

Dawnus is committed to communicating the policy effectively through training and awareness programmes for staff at all levels.

The policy will be incorporated into the staff handbook and posted on staff notice boards. New employees will be briefed as part of the induction process, and the policy will be made available to other workers on their engagement.

Types of Discrimination

There are several types of discrimination. The following are the types of discrimination that this policy aims to avoid:

Direct Discrimination

This occurs when a person is treated less favourably because of a protected characteristic that they have (or are thought to have – see “Perceptive Discrimination” below). For example – making decisions about whether someone should be offered, or not offered, a job because of a protected characteristic or treating colleagues or customers differently because of a protected characteristic.

Associated Discrimination

Direct discrimination (above) can also occur by way of association, which is when a person is treated less favourably because, for example, their spouse or relative has a protected characteristic.

Perceptive Discrimination

Direct discrimination (above) can also occur because the discriminator thinks the person possesses a protected characteristic on which discrimination is based, even if they do not in fact do so.

Indirect Discrimination

This occurs when a provision, criterion or practice is applied to everyone but has a disproportionate adverse impact

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on people with a particular protected characteristic. For example: setting height restrictions which indirectly discriminate against women or certain ethnic groups.

Victimisation

Victimisation is treating a person unfavourably because the person has made a complaint, acted as a witness to a complaint, or initiated proceedings connected with a complaint of discrimination. Victimisation in itself is a form of unlawful discrimination.

Harassment

Harassment is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating and intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Harassment may involve a single incident or persistent behaviour that extends over a period of time and can occur even if someone did not mean to cause offence. It also means that a person can be subjected to harassment by behaviour that is not aimed at them directly but which they nonetheless find unpleasant.

Harassment is always unacceptable and Dawnus will take all reasonable steps to ensure that employees are protected against harassment. Where harassment is related to a protected characteristic it will also be unlawful.

Discrimination arising from Disability

In addition to the above, it is unlawful to treat a person unfavourably because of something that is the result, effect or outcome of their disability, unless the treatment is necessary and can be objectively justified. Furthermore, employers have a duty to make reasonable adjustments to ensure that disabled applicants, employees or other workers are not substantially disadvantaged.

Creating Equal Opportunities in the Workplace

There are a number of ways in which Dawnus aims to ensure equal opportunities in the workplace including:

Recruitment and Selection

Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and will be based upon specific and job-related criteria. Decisions regarding an individual's suitability for a particular role will be based on aptitude and ability.

To ensure all Recruitment and Selection decisions follow to the specific legislation, the following guidelines should be adhered to:

- Advertise to the widest possible pool of applicants;
- Ensure procedures and decisions are supported by documentation based on job requirements;
- Ensure that interviews and other selection methods are conducted fairly and consistently and outcomes recorded;
- Dawnus will take all reasonable steps to make recruitment decisions based on ability and qualification without regard to protected characteristics. No decision will be made which cannot be objectively justified;
- Selection will be based on the job requirements and the individual's suitability and ability to do, or train for, the job in question. All applicants will be treated equally;
- No assumptions will be made about an individual's ability to perform tasks and decisions will be made based on the information available.

Dawnus will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled

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applicants are not substantially disadvantaged.

Career Development and Training

All employees will be encouraged to develop their full potential and we will not unreasonably deny an employee access to training or other career development opportunities. Employees will be given opportunities for promotion and career progression within the business depending on job related competencies, qualifications, abilities, skills training and experience, and in accordance with the future needs of the business.

Applicants/Employees with a Criminal Record

There are important social and business arguments for employing people with criminal records in a responsible and balanced way that maintains a duty of care to employees and customers, protect business interests and gives access to the widest pool of talent. We also need to ensure compliance with the Rehabilitation of Offenders Act.

In making employment decisions, line managers should make objective assessments, adopt an open mind and focus on merit and ability to do the job. Consideration should be given to extenuating circumstances, the nature and relevance of the offence, the potential risks involved in employing the offender, if and how these could be sensibly and effectively managed.

When making decisions we must consider our duty to provide a safe working environment for all employees.

Terms and Conditions

Our terms and conditions of service will be applied fairly and rewards and benefits will be made available to all staff who should have access to them, as appropriate.

Employment Policies and Practices

Dawnus aims to ensure that employment policies and practices, including any rules or requirements, do not directly or indirectly discriminate and are applied in a non-discriminatory manner. In particular we will ensure that all disciplinary decisions are fair and consistent and that selection for redundancy is based on objective criteria.

The Company will consider making any appropriate reasonable adjustments to the working environment or any work arrangements that would alleviate any substantial disadvantage these cause disabled staff.

We will aim as far as reasonably practicable to accommodate the requirements of different religions and cultures and will consider requests from employees to vary or change their working hours to enable them to care for a dependant.

Raising a Complaint

All employees, in the first instance, are encouraged to resolve any situation of perceived discrimination, harassment or bullying, by talking directly, politely and unambiguously to the person concerned, who may be unaware that their behaviour is unacceptable.

If this informal approach is not possible, or does not have the desired effect and the conduct continues, or it is not appropriate to resolve the problem informally, then employees should follow the procedure contained in the Grievance Policy ([HR_PR_009](#)).

If the individual is not an employee they should put their complaint in writing to a member of the HR Department at Dawnus Head Office.

Any employees who is found to have committed an act of discrimination, or breached this policy in any way, will be

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subject to action under the Disciplinary Procedure, up to and including dismissal. Non-employees will be subject to appropriate formal action that may, depending on the circumstances, involve terminating any contract or agreement.

Dawnus will also take seriously any malicious or unwarranted allegations of discrimination and will take appropriate action, disciplinary or otherwise, where necessary. Unfounded complaints, which are not upheld but made in good faith, will not be subject to disciplinary action.

Diversity and Inclusion Monitoring

The Company will monitor the effectiveness of this policy to ensure it is achieving its objectives. As part of this process we will monitor:

- The composition of job applicants and decisions in recruitment;
- The composition of our workforce;
- Access to training, promotion and other opportunities and benefits;
- The impact of our employment policies, including use of the disciplinary and grievance procedure;
- Dismissals and other terminations.

Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.



Nick Down
Group Managing Director
Dawnus Group Ltd
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