

Document Title

Equal Opportunities Policy

BCN Group Ltd ("the Company") is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, gender, gender reassignment, maternity, marital status, disability, religious beliefs, age or sexual orientation. This Policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.

The Company also aims to provide a service that does not discriminate against its clients and customers in the means by which they can access the services and goods supplied by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

Objectives of this Policy

- To reduce, stop and prevent all forms of unlawful discrimination.
- To ensure that recruitment, promotion, training, development, assessment, redundancy and service provision are determined on the basis of capability, qualifications, experience, skills and productivity.

Designated Officer

Position:	CFO
Telephone Number	0345 095 7000

Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, gender, gender reassignment, maternity, marital status, disability, religion, age, sexual orientation. Discrimination may be direct or indirect.

Types of Discrimination

Direct Discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, gender, gender reassignment, maternity, marital status, disability, religion, age, sexual orientation.

Indirect Discrimination

This is the application of a policy, criterion or practice to a person which the employer would apply to others, but which is such that:

- It is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents;
- The employer cannot justify the need for the application of the policy on a neutral basis; and
- The person to whom the employer is applying it suffers detriment from the application of the policy.

Example: Working hours which conflict with religious observances may not allow individuals with those beliefs to work at the business which may be indirect discrimination. For example, someone who is Jewish and observes the Sabbath cannot work Saturdays, and therefore could not be employed within a role that requires working on a Saturday.

Unlawful Reasons for Discrimination

Gender and Marital Status

It is not permissible to treat a person less favourably on the grounds of their gender or the fact they are married. This applies to both men and women. Sexual harassment of men and women can be found to constitute sex discrimination. For example, asking a woman during an interview if she is planning to have any (more) children constitutes discrimination on the ground of gender.

Maternity

It is not permissible to treat a person less favourably on the grounds of maternity, for example because of pregnancy or illness suffered because of it.

Age

It is not permissible to treat a person less favourably because of their age. This applies to people of all ages. This does not currently apply to the calculation of redundancy payments.

Disability

It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to the service and ability to be employed, trained, or promoted as a non-disabled person.

Race

It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.

Sexual Orientation

It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because s/he is homosexual, or transsexual.

Religion or Belief

It is not permissible to treat a person less favourably because of their religious beliefs or their religion.

Reasonable Adjustments

The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- Making adjustments to premises;
- Re-allocating some or all of a disabled employee's duties;
- Transferring a disabled employee to a role better suited to their disability;
- Relocating a disabled employee to a more suitable office;
- Giving a disabled employee time off work for medical treatment or rehabilitation;
- Providing training or mentoring for a disabled employee;
- Supplying or modifying equipment, instruction and training manuals for disabled employees; or
- Any other adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company.
- If an employee has a disability and feels that any such adjustments could be made by the Company, they should contact the HR Department.

Responsibility for the Implementation of this Policy

The co-operation of all employees is essential for the success of this Policy. However, the ultimate responsibility for achieving the objectives of this Policy, and for ensuring compliance with relevant Legislation and Codes of Practice, lies with the Company. Senior employees are expected to follow this Policy and ensure that all employees, subcontractors and agents do the same.

All employees, subcontractors and agents of the Company are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination on the grounds of race, gender, gender reassignment, maternity, marital status, disability, religion, age, sexual orientation. Employees may be held independently and individually liable for their discriminatory acts by an Employment Tribunal and ordered to pay compensation to the person who has suffered as a result of discriminatory acts.

Acting on Discriminatory Behaviour

In the event that an employee is the subject or perpetrator of, or witness to, discriminatory behaviour, please refer to the company reference database on disciplinary and grievance procedures.

Advice and Support on Discrimination

Employees may contact their employee or trade union representative if access to such an individual is possible.

Other contacts include:

The Disability Rights Commission

Freepost MID 02164
Stratford-upon-Avon
CV37 9BR

Telephone: 08457 622 633

Website: www.drc.org.uk

Equality and Human Rights Commission

Arndale House
Arndale Centre
Manchester
M4 3AQ

Telephone: 0161 829 8100

Website: www.equalityhumanrights.com

Community Legal Services Direct

Telephone: 0845 345 4 345

Website: www.clsdirect.org.uk

Citizens Advice Bureau

3rd Floor North
200 Aldersgate
London
EC1A 4HD

Website: www.citizensadvice.org.uk

The Extent of the Policy

The Company seeks to apply this Policy in the recruitment, selection, training, appraisal, development and promotion of all employees. The Company seeks to ensure that all sub-contractors and agents act in accordance with this Policy. The Company accepts no liability for the actions of sub-contractors and agents. The Company offers goods and services in a fashion that complies with the spirit of this Policy. This Policy does not form a part of any employment contract with any employee and its contents are not to be regarded by any person as implied, collateral or express terms to any contract made with the Company.

The Company reserves the right to amend and update this Policy at any time.

Document Title

Equal Opportunities Policy

Date

8th August 2017

Prepared by

Richard Sherlock

richard.sherlock@bcn.co.uk

Document Revision

Reference	Version	Modified Date	Author(s)	Comments
QMS-205	9	March 2024	Carolann Carter	Annual Review

Document Management

Responsibility	Owner
CFO	People & Culture Lead

ISO Applicable?

9001:2015	27001:2013	Clause Identifiers
Yes	No	

Confidentiality

BCN Group Ltd	Client	Proprietary	Public
Yes	No	No	Yes

Used in IO
No

Document reference key

QMS – 9001 – Quality Management System
ISMS – 27001 – Information Security Management System
IMS – 9001 & 27001 – Integrated Management System
BCN – BCN process or procedure

Read Only Copy – See Policies & Procedures repository for latest revision.