



**Diversity and Equal Opportunities
Policy**

Diversity and Equal Opportunities Policy

Our Commitment

TPP is proud to be a multi-cultural organisation. We are committed to promoting equality and diversity within an inclusive and supportive environment.

In particular, we will: -

- ensure that all individuals are treated fairly, and with dignity and respect;
- ensure that opportunities we provide are open to all;
- promote diversity by recognising the particular contributions that can be made by those with different backgrounds and experiences;
- create and maintain a safe, supportive and welcoming work environment for our employees, candidates and visitors that is free from harassment and bullying;
- strive to make sure that our clients meet their own diversity targets.

The Company wholeheartedly supports the principle of diversity and equal opportunities in employment and opposes all forms of unlawful and unfair discrimination towards employees, candidates, customers and suppliers. The Equality Act 2010 brought together what it calls “protected characteristics” under the one Act, and these are: race, sex, gender reassignment, marriage and civil partnership, pregnancy/maternity, religion or belief, sexual orientation, age, and disability. It is unlawful to discriminate against employees or candidates on these grounds.

We believe that it is in our own best interests, and those of our employees and candidates, to ensure that the people, talents and skills available throughout the community are considered when employment opportunities arise. We are committed to calling upon the widest range of knowledge, skills and experience, complying with the relevant legislation and codes of practice and achieving and maintaining a workforce that is representative of the local community in which we operate.

We take every possible step to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, training, promotion and career management are based only on objective and job related criteria. Decisions relating to clients and suppliers will be based on business-related criteria only and any irrelevant information will not form part of the process.

The aim of the policy is to ensure that no job applicant, employee or candidate should receive less favourable treatment on any grounds and wherever possible, they are given the help they need to attain their potential to the benefit of the Company and themselves, and will extend to all aspects of our dealings with clients, suppliers and the general public.

TPP shall not discriminate unlawfully in relation to which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. TPP will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the particular vacancy.

This policy is intended to assist the Company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

The policy will be reviewed on ongoing basis to judge its effectiveness and reflect changes in the law, demographics and internal business requirements.

Our Diversity Ethos

We value the differences that a diverse workforce can bring to our organisation.

We understand that an employee and candidate community that draws upon a variety of backgrounds, skills, attitudes and experience is crucial to the creativity and innovation we need to drive our business forward.

We understand that diversity brings positive benefits that will improve and strengthen our business. We are serious about being customer-driven and we recognise that this can only be achieved by being fair employers and business people.

We strive to build a culture that values meritocracy, openness, fairness and transparency.

Implementation

It is the responsibility of TPP to promote equality of opportunity and diversity in employment and to monitor the implementation of this policy.

The COO/CEO are the Company's senior level diversity and equal opportunities champions and as such are, on behalf of TPP, the individuals responsible for the effective operation of the policy.

The Company will ensure that the policy is effectively communicated and that proper training and guidance is given to ensure that everyone fully understands their responsibilities as set out both in the policy, codes of practice and the legislation. A copy of this policy is available in our Handbook and displayed in all reception areas.

All employees have a responsibility to observe this policy and to ensure that diversity management and equality of opportunity is continuously provided for in the Company's activities.

In addition, Managers have a particular responsibility for ensuring the policy is fairly and consistently applied in all areas under their control.

Employees are encouraged to assist in the removal of any discriminatory practices that may exist in the Company by drawing them to the attention of the management, who oversee our diversity and equal opportunity policy.

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another in comparable circumstances on a prohibited ground. An example of direct sex discrimination would be refusing to employ a woman because she was pregnant.

Indirect discrimination is where a provision, criterion or practice is applied which is such that it would be to the detriment of a considerably larger proportion of the relevant group to which the individual belongs than to others, which is not objectively justifiable and which is to the individual's detriment. An example of indirect sex discrimination could be requiring everyone to work full time unless there is a good reason, unrelated to sex, as to why the particular job has to be done on a full-time basis, since requiring everyone to work full time will normally adversely affect a higher proportion of women than men.

Harassment is where there is unwanted conduct related to one of the prohibited grounds which has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, or is reasonably considered by that person to have the effect of violating his or her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her, even if this effect was not intended by the person responsible for the conduct.

Third party harassment is where employees are protected from harassment by people who are not employed in their organisation and whom they come into contact with during the course of their work. All protected characteristics are covered by this except pregnancy/maternity and marriage/civil partnerships.

Discrimination by association is where direct discrimination takes place against someone because they associate with another person who possesses a protected characteristic. All protected characteristics are covered by this except pregnancy/maternity and marriage/civil partnerships.

Failure to make reasonable adjustments is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

Victimisation is where someone is treated less favourably than others because he or she has alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Areas covered by the policy:

Equal opportunities in employment – Code of Recruitment Practice

- the Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy;
- TPP is responsible for ensuring that no employee or job applicant receives less favourable treatment and that no employee or job applicant is placed at a disadvantage by requirements that are either directly or indirectly discriminatory;
- the Company has an open recruitment policy and uses a wide spectrum of different attraction methods e.g. press advertising campaigns, Internet, and local bespoke campaigns. TPP will utilise JobCentre Plus and, wherever possible recruit from the local community;
- the Company exercises proactivity in diverse markets by using publications targeted at a range of ethnic groups and by aiming to advertise in areas of the community where ethnic minorities live;
- person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary;
- job applicants and employees will be asked to complete the appropriate application form in order to ensure a consistent information base for interview shortlists. The form will consist of two sections – a) qualification and employment experience b) personal information including sex, age, nationality etc. Selection for interview will occur after consideration of Section (a) **only**;

Section (b) will be used in accordance with the Monitoring category of the Equal Opportunities Policy as detailed. The Company guarantees that this section of the form will only be used for the purpose of monitoring the effectiveness of its equal opportunities policy;

- all Company employees required to select staff/progress candidate applications undergo appropriate training in Interview and Selection techniques;
- application forms and interview records must be kept as required through legislation after the completion of a recruitment campaign to ensure a detailed response can be given to those regretted candidates who challenge the fairness and objectivity of the recruitment process;
- the Company cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the Company may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group which the Company identifies as being underrepresented in particular types of job;
- TPP recognises the need for working arrangements to be flexible enough to accommodate the shifting priorities of its staff and offer individuals a better fit between working lives and domestic arrangements;
- the Company will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the Company considers it has good reasons, unrelated to any prohibited ground of discrimination, for doing so. The Company will comply with its obligations in relation to statutory requests for contract variations. The Company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability;
- the Company supports work-life balance through, for example, adoptive, maternity and paternity leave, flexible working hours, part time working, and parental leave, all of which are outlined in other policies;
- working hours may also be adapted to meet cultural or religious needs, such as prayer times and holy days as in the Religious or Creed and Personal Beliefs Section of this Policy. Flexible arrangements facilitate our retention of skilled and experienced workers and can contribute to improved team working and enhanced individual output;
- the Company will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

Religious or other beliefs

Neither the Company nor its employees will discriminate against any religious or other beliefs, provided they do not run counter to this policy by advocating discrimination or intolerance of other employees. The Company will endeavour to accommodate as far as practicable essential practices related to such beliefs provided that they neither breach Company policy nor interfere with the efficient running of the business or its legal obligations e.g. health and safety.

Disability

The Company will consider requests for adjustments that may enable disabled employees to effectively fulfil their duties. Where these are considered to be reasonable requests, the Company will commit to making those changes.

When assessing candidates to be put forward for a vacancy or assignment, the Company will not unlawfully discriminate against those with a disability.

Age

In assessing the ability of an individual to carry out a specific job, the assessment will be based on the requirements for that job. Age, in isolation, will neither be used to justify the appointment nor to debar an applicant from an appointment.

Dignity at work

The Company will not tolerate harassment or intimidation of an individual. The Company has a separate Dignity at Work policy concerning issues of bullying and harassment on any ground, and how complaints of this type should be dealt with.

Clients, suppliers and other people not employed by the Company

The Company will not discriminate unlawfully against clients using or seeking to use facilities or services provided by the Company.

Employees should report any bullying or harassment by clients, suppliers, visitors or others to their managers who will take appropriate action (see “third party harassment” above).

Liability

Employers can be held liable in law for acts of discrimination committed by employees.

Individual employees can be held personally liable for acts of discrimination that they commit, authorise, contribute to or condone.

Behaviour or actions by employees, which go against the spirit or letter of this policy, would constitute serious misconduct liable to disciplinary action, which may include summary dismissal.

The following are examples of such action, however the list should not be seen as exhaustive:

- discrimination in the course of their employment against employees or job applicants in any aspect of employment or pre-employment on grounds established within the Equal Opportunities Policy Statement;
- inducing or attempting to induce, employees or managers to practice unlawful discrimination;
- indulging in verbal or physical sexual or racist harassment of a nature which known, or should be known, to be offensive to the victim;
- victimising individuals who have made allegations or complaints of sexual or racial discrimination or harassment or provided information about such discrimination or harassment.

Training and communication

The Company undertakes to provide training and information for employees to ensure that they understand their position in law, the Company's equal opportunity policies and their responsibilities under this policy. In particular, mandatory training will be incorporated into: -

- first appointment supervisor/manager programmes;
- induction programmes;
- recruitment/selection programmes

Objectives relating to fair and inclusive practices will be included in all employees' performance indicators and will form an integral part of performance reviews throughout the year.

External agencies and contractors offering services to the Company will be briefed on and expected to act in accordance with the policy.

The Company also provides training to all existing and new employees and others engaged to work at the Company to help them understand their rights and responsibilities under the Dignity at Work policy and what they can do to help create a working environment free from bullying and harassment.

Monitoring and review

This policy will be monitored periodically by the Company to judge its effectiveness and will be updated in accordance with changes in the law. Corrective action will be taken where appropriate.

In particular, the Company will monitor the ethnic and gender composition of the existing workforce (to include employees and independent contractors) and of candidates for jobs (including promotions), and the number of people with disabilities within these groups, and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the Company will implement them.

The provision of training and development opportunities through the management is monitored annually to ensure that there are no inequalities in either the content of the training or the opportunities for employees.

Grievance and disciplinary cases are ethnically monitored to establish and ensure that the policies are being applied equally and appropriately in the circumstances of each case.

Reasons given for leaving the Company's employment are monitored to establish any retention problems related to inequality.

Grievance and Disciplinary Procedure

If you consider that you may have been unlawfully discriminated against, you may use the Company's grievance procedure to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the Dignity at Work policy.

The Company will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Our commitment to the future

Alongside all the ongoing monitoring we carry out, we understand that although a Diversity and Equal Opportunities policy is a fundamental part of our operating strategy, it will only be brought to life if it is reinforced by focused and structured processes and measurements:

To this end, the Company:

- has identified a senior level champion for leading the equal opportunities and diversity strategy and has secured top-level ownership and sponsorship for the diversity programme;

- will join appropriate organisations to network, exchange best practice and raise the Company's profile;
- build relationships with trade, and the local and national press to develop a good external image and to position the Company at the leading edge;
- will endeavour to capture all available workforce metrics from existing databases to benchmark against sector companies, demographics and best practice standards;
- agree the aspirational targets for the workforce composition over a five-year period with the board;
- establish formal measurement tools to assess the climate in the Company (for example, regular staff surveys);
- maintain and develop relationships with external benchmarking bodies to assess progress (for example, Race for Opportunity, Third Age Employment Network, Opportunity Now, and the Equality and Human Rights Commission);
- audit all processes to establish the Company's position with regard to best practice;
- benchmark existing policy statements from other organisations and advisory groups;
- integrate diversity further into mainstream training and development programmes;
- ensure comprehensive diversity communications programme;
- monitor progress against set targets and objectives.