

# EQUAL OPPORTUNITIES POLICY

Approved By: James Lawrence

Position: Director

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## Equal Opportunities Policy

### POLICY STATEMENT

The aim of this policy is to communicate the commitment of the Directors of the Company to the promotion of equality of opportunity in the Company. The policy is supported by the Directors of the Company.

The policy is not contractual but is intended as a statement of current Company policy. The Company reserves the right to amend the policy as necessary to meet any change in requirements.

It is the Company's policy to provide equality for all, irrespective of:

- gender, marital or family status
- disability
- race
- ethnic origin or nationality
- age
- membership/non-membership of trade unions
- working hours
- sexual orientation

The Company is opposed to all forms of unlawful and unfair discrimination.

All full-time and part-time employees and job applicants (actual or potential) will be treated fairly and selection for employment, promotion, training, or any other benefit will be based on his or her relevant merits, aptitude and ability. All positions (except those subject to legal exemption, for example, genuine occupational qualifications) will be equally open to all members of the community. The Company hopes that the equal opportunities policy will help all employees to develop their full potential.

The Company is committed to:

- taking reasonable steps to preventing any form of direct or indirect discrimination or victimisation
- equal opportunities for women and men
- equal opportunities for people with disabilities
- equal opportunities regardless of race, ethnic origin or nationality
- equal opportunities for part-time employees
- equal opportunities for employees with caring responsibilities and a recognition of maternity and parental leave rights
- equal opportunities in the provision of training
- promoting a workplace where people are treated with respect and dignity and where no form of intimidation or harassment is or will be tolerated
- taking reasonable steps to make sure that no employee or job applicant is placed at a disadvantage by requirements or conditions, which in the case of disabled employees or job applicants cannot be justified and which have a disproportionate adverse effect on people of a particular race, ethnic minority or gender.
- taking reasonable steps to make sure that no employee or person connected to the work of the Company, including contractors and clients, experiences unlawful discrimination
- fulfil all legal obligations under the relevant legislation.

Breaches of this policy will be treated as misconduct, or in the case of serious breaches, gross misconduct. Where appropriate, disciplinary action will be taken which could, in serious cases, lead to dismissal with or without notice or payment in lieu of notice. In addition, individuals can be held personally liable for acts of discrimination/harassment which they commit, authorise, contribute to or condone.

## TYPES OF DISCRIMINATION

- Sex discrimination is unlawful unless the job is covered by an exemption such as a genuine occupational qualification.
- Direct sex discrimination occurs when an employer treats someone (i.e. an employee or prospective employee) less favourably on grounds of his or her gender, marital status or sexual orientation in terms of, for example, recruitment and offers of employment, terms and conditions of employment, access to or denial of opportunities including promotion and training, dismissal or subjecting them to some other detriment. Indirect discrimination occurs when an unjustifiable requirement or condition is applied equally to both sexes but has a disproportionately adverse effect on one sex (because the proportion of one sex that can comply with it is much smaller than the proportion of the other sex that can comply with it). Indirect sex discrimination has been proven in less favourable treatment of part-time workers, imposing age limits and changes in hours of work that do not recognise caring responsibilities.
- Sexual harassment is unlawful discrimination and, in some circumstances, can be a criminal offence. Harassment is any behaviour that is unwanted by the recipient/complainant, where it is used as the basis for an employment decision or where it creates a hostile working environment. It is the impact of the behaviour which is relevant and not the motive or intent behind it. Harassment covers a wide range of behaviour including (but not limited to): physical contact ranging from unnecessary touching or brushing against a person, to actual physical contact or serious assault; verbal and written harassment through making derogatory remarks or jokes, or sexist remarks, expression of discriminatory views and intimidating comments, obscene gestures, pin ups, graffiti, using e-mail to send suggestive and unwanted remarks and/or graphics (including pornography) other offensive material.
- Equal pay entitles women to equal pay with men (and vice versa) if they do the same or broadly similar work, if their jobs are rated equivalent under a valid job evaluation scheme, or if their work is of equal value when compared in terms of the demands made on the employee in the job.
- Racial Discrimination is unlawful unless the job is covered by an exemption such as a genuine occupational qualification.
- Direct race discrimination occurs when an employer treats someone less favourably on racial grounds (i.e. discrimination on grounds of race, colour, nationality, ethnic or national origin) than they would treat someone else, in terms of recruitment and offers of employment, terms and conditions of employment, access to or denial of opportunities including promotion and training, dismissal or subjecting them to some other detriment.
- Indirect discrimination on racial grounds has been proven to exist in cases of less favourable treatment arising from dress codes/uniforms and qualification requirements.
- Racial harassment is unlawful discrimination and, in some circumstances, can be a criminal offence. See paragraph 2.1.2 above for further details of what constitutes harassment.
- Disability Discrimination. A disability is a physical or mental impairment that has a substantial and long-term adverse effect on a person's ability to carry out normal day to day activities. Disability discrimination is unlawful where there is unjustified less favourable treatment of a disabled person (including a person who has had a disability

in the past) in relation to employment (including contract workers), employment practices and premises, including selection arrangements, recruitment, opportunities for promotion, transfer, training or receipt of other employee benefits or refusal of such opportunities, terms and conditions of employment, pensions, benefits and working conditions (including relating to employees who have become disabled or whose disability has got worse).

- Employers also have a duty to consider and to make reasonable adjustments to help disabled people overcome any practical difficulties that they may face during recruitment or in their work. For example, adjusting premises, altering working hours, providing training or a reader or an interpreter, acquiring or modifying equipment, modifying procedures for testing or assessment or allowing absence during working hours for rehabilitation.
- It is also unlawful when providing goods, facilities or services to the public to discriminate against disabled people in certain circumstances.
- Harassment on grounds of disability is unlawful discrimination.
- Discrimination against part-time employees is unlawful when treatment of part-time employees is less favourable than that of comparable full-timers, unless the different treatment is justified on objective grounds. Less favourable treatment will include, different terms and conditions of employment (i.e. not pro-rata entitlements), hourly rates and overtime rates (once the part-timer has worked more than the normal full time hours), exclusion from training because they work part-time, different entitlements to annual leave and maternity/parental leave entitlements not on a pro-rata basis.

## IMPLEMENTATION OF THE POLICY

The Directors of the Company have responsibility for the effective implementation of this policy. Each director, manager and supervisor also have responsibilities and the Company expects all its employees to abide by and support the policy.

To implement the policy, the Company will take reasonable steps to:

- effectively communicate the policy to all its employees, for example through induction training, management training, by setting out in the staff handbook and making it known to job applicants
- make managers and supervisors aware of their responsibilities.
- give appropriate training and guidance, including training on induction and management courses
- adequate resources will be made available to achieve the aims of this policy.

## HARASSMENT AND BULLYING POLICIES

Employees who believe that they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the Harassment and Bullying and Grievance procedures. All such complaints will be dealt with seriously, sympathetically, fairly, without undue delay and, where practicable, confidentially.

Every effort will be made to ensure that employees making complaints are not victimised. Any complaint of victimisation will be dealt with seriously, without undue delay and, where practicable, confidentially. Proven cases of victimisation will be treated as gross misconduct and may, depending on the circumstances, result in dismissal without notice.

## Review

This policy is to be reviewed annually or if there is a significant event that affects the integrity and adherence to this policy.

Director: James Lawrence

SIGNED:



This Equal Opportunities Policy is displayed at the Head Office and is available to all personnel including visitors and contractors. All employees are encouraged to read it and communicate any query to the Directors. A copy of this Policy can also be obtained on request (to any interested parties) from our Head Office.

# Peregrine

Risk Management



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