

Covenant Direct Ltd

Equality & Diversity Policy

Equality & Diversity Statement

“Covenant Direct is committed to promoting equality and diversity amongst our workforce and eliminating all forms of discrimination. All those who work for us, applicants for employment, customers and clients will receive equal treatment regardless of age, disability, sex (gender) and sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin) and religion and belief. Under current legislation these are known as the ‘protected characteristics’.

The aim is for our workforce to be truly representative of all sections of society and for each employee to feel respected and able to give their best.

The Company’s philosophy reflects discrimination whether direct, indirect, by association or perception and goes beyond its legal obligations to include all forms of discrimination based on physical characteristics, lifestyle choice, political opinions or socio-economic background.”

Simon Pearce

Director

1. Purpose & Scope

The purpose of the policy is to:

- 1.1 Create a working environment free of discrimination and any associated bullying, harassment and/or victimisation, where individual differences and the contributions of all employees are recognised and valued.
- 1.2 Promote equality, fairness, dignity and respect for all in our employment, whether temporary, part-time or full-time, as well as all those with whom we come into contact in our daily working lives.
- 1.3 Prevent unlawful discrimination arising out of the protected characteristics under the Equality Act 2010 and furthermore, extend the scope to include all forms of discrimination based on other characteristics, opinions or choices.
- 1.4 Raise awareness with a view to avoiding all forms of discrimination in such areas as pay and benefits, terms and conditions of employment, dealing with grievances and disciplinary or dismissal matters, redundancy, family related

leave, requests for flexible working and selection for employment, promotion, training or other developmental opportunities.

2. Definitions

- 2.1 *Direct discrimination* occurs where an employer treats an individual less favourably than someone else would have been treated because of a protected characteristic.
- 2.2 *Indirect discrimination* occurs where the employer applies a provision, criterion or practice which, although it is applied equally to everyone, has a disproportionate adverse impact on people who share a particular protected characteristic and the employer cannot justify the application of the provision, criterion or practice on objective grounds.
- 2.3 *Associative discrimination* occurs when someone is treated less favourably because of an association with someone who possesses a protected characteristic.
- 2.4 *Perceptive discrimination* occurs when others perceive that someone possesses a particular characteristic even if they do not actually possess that characteristic.

3. Practice

The Company will:

- 3.1 Train managers and all other employees about their rights and responsibilities under equality legislation and in particular, ensure that all employees understand their liability, as well as the Company's, for acts of unlawful discrimination, bullying, harassment and victimisation in the course of their employment against any individual.
- 3.2 Take seriously complaints of discrimination and any associated bullying, harassment and/or victimisation by employees, customers, clients or any other individual in the course of the Company's work activities.
- 3.3 Deal with complaints against employees under the Company's Grievance and/or Conduct & Capability Policies which in the most serious cases may amount to gross misconduct and could lead to dismissal.
- 3.4 Deal with complaints by employees against third parties in the strongest possible terms with the third party concerned and/or their employing organisation.
- 3.5 Make opportunities for training, development and progress available to all employees, who will be helped and encouraged to develop their full potential so their talents and abilities can be fully utilised to maximise the success of the Company.

3.6 Review employment practices, policies and procedures from time-to-time to ensure fairness and reflect any relevant changes in the law or good practice.

3.7 Monitor the profile of the workforce to assist in ensuring employment practices remain compliant with legislation as well as best practice. Such monitoring will be carried out via questionnaires and appropriate statistical analysis and would normally deal with such areas as age, gender, ethnic origin, sexual orientation, religion and disability.

4. Responsibilities

Employees at all levels have a responsibility to guard against any form of discrimination and avoid any action which is contrary to the Company's policy on equality and diversity.

4.1 In particular, employees must:

- a) Co-operate with any measures introduced to ensure compliance with this policy;
- b) Report any suspected discriminatory acts or practices including those perpetrated by a third party, for example a customer or client, as soon as possible;
- c) Not induce or attempt to induce others to commit an act which would be discriminatory;
- d) Not victimise anyone as a result of having made a complaint, pursued a grievance or provided evidence of discrimination;
- e) Not harass, abuse or intimidate others including third parties, for example, customers or clients;
- f) Not make remarks or insinuations, either verbal or non-verbal, which may cause offence to others.

4.2 People managers have additional responsibilities to:

- g) Ensure all employees are aware of their responsibilities under this policy, in particular drawing the attention of new employees to the policy as soon as possible after commencement of employment.
- h) Ensure any complaints or grievances relating to discriminatory acts are dealt with promptly and in a fair and consistent manner.
- i) Ensure proper records of employment decisions are maintained.

5. Other Policies

5.1 Any employee who believes that they are or have been subjected to any forms of bullying, harassment and/or victimisation should refer to the Company's Workplace Behaviour (Bullying & Harassment) Policy in the first instance.

5.2 Any employee who feels that a complaint relating to discrimination has not been satisfactorily resolved or if the complaint is serious, should refer to the Company's Grievance Policy & Procedure.

6. Contractual Status

This policy and procedure is non-contractual and may be varied, suspended or terminated at the Company's discretion.