

EQUAL OPPORTUNITIES



SCOPE

The Anglian Group intends to promote equality of opportunity for everyone with whom it or its employees come into contact. Accordingly this policy applies to current and prospective employees, customers and clients, contractors, agency workers, suppliers and visitors of the Anglian Group as well as to the general public.

POLICY

The aim of this policy is to communicate the dedication and commitment of the Chief Executive, Board of Directors and Senior Management Team to the promotion and protection of equality of opportunity both within the Anglian Group workforce and in all its external relationships.

The Anglian Group strives to ensure that everyone has equality of opportunity irrespective of their:

- Sex;
- Marital or civil partnership status;
- Gender reassignment;
- Race;
- Colour;
- Ethnic origins;
- National origins;
- Disability;
- Sexual orientation;
- Religion or belief, including philosophical and/or political beliefs;
- Age;
- Membership or otherwise of a trades union;
- Having dependents;
- Exercise of family rights (including maternity leave/pay; paternity leave/pay; adoption leave/pay; parental leave; flexible working; time off for dependents).

The Anglian Group recognises that the provision of equal opportunities is not only good management practice in the workplace, it also makes sound business sense in the world at large. It ensures a healthy working environment and encourages good and productive relationships.

This equal opportunities policy will help all those who work for us and with us to work harmoniously and develop their full potential, utilising the talents and resources of the workforce fully to maximise the efficiency of the organisation. Those for whom we work will be treated with the same dignity and respect with which we strive to treat each other.

Decisions regarding recruitment, selection, terms and conditions, promotion and training of staff and about the selection of those with/for whom the Anglian Group will contract/work will be made objectively and without unlawful discrimination of any nature. No decision which has the effect of disadvantaging a particular group will be made without proper objective justification.

RESPONSIBILITIES

Board of Directors - The Board of Directors, supported by the Group HR Director, has ultimate responsibility for the policy and will uphold the policy both in its letter and in spirit at all times.

Directors, Managers and Supervisors - Directors, Managers and Supervisors have ultimate responsibility for the implementation and promotion of the policy and are expected to:

- Regularly remind themselves of the content of this policy;
- Ensure that their staff are aware of their responsibilities and of the importance and value of diversity and equality in the workplace;
- Lead employees and others over whom they have influence or control to adhere to the policy at all times;
- Ensure that recruitment and selection processes, grievances, disciplinary hearings, training and promotion issues, etc are dealt with in a manner consistent with this policy;
- Bring any suspected breaches of this policy to the immediate attention of more senior management and/or human resources.

Employees - All employees are expected to:

- Regularly remind themselves of the content of this policy;
- Implement and promote the policy at all times;
- Encourage colleagues and others over whom they have influence or with whom they are working to adhere to the policy at all times;
- Bring any suspected breaches of this policy to the immediate attention of their supervisor or manager and/or human resources.

Others - All other persons will be:

- Given access to a copy of this policy (prospective employees, self-employed personnel and agency workers); or
- Given access to a copy of this policy (clients/customers, suppliers, visitors of the Anglian Group and members of the general public); and
- At all times made aware that the Anglian Group will not do business with, work with or work for any individual, company or partnership or other organisation which does not uphold the principles of equality of opportunity.

EQUALITY PRINCIPLES

We are committed to ensuring that:

- Equality of opportunity is provided and promoted for all persons;
- All persons are treated with dignity and respect at all times;
- A safe, pleasant and harmonious working environment is maintained;
- Occurrences of direct or indirect discrimination, victimisation or harassment are prevented;
- The Anglian Group's legal obligations under all equality legislation enacted from time to time and all associated codes of practice are fulfilled;
- Open recruitment practices are utilised, including advertising jobs publically and as widely as possible;
- The Anglian Group has access to the widest labour market and maintains an ability-based workforce which is representative of the working population in each labour market area;
- Positive and affirmative action is taken where appropriate and necessary to achieve a more representative workforce;
- This policy is disseminated, promoted and enforced vigorously throughout the Anglian Group;
- Provision is made for individuals who believe that they have suffered discrimination to seek prompt and effective redress;
- Any breaches of this policy are regarded as misconduct (or in serious cases gross misconduct) and strictly enforced through the Anglian Group disciplinary procedure or, in appropriate cases, through the cancellation/cessation of contracts or works.

IDENTIFYING DISCRIMINATION

Unlawful discrimination will not be tolerated. Few individuals admit to such discrimination, even to themselves. Indeed, whilst discrimination may often be the result of recognised prejudices, misconception or stereotyping, it can also be subconscious and unintentional. Discrimination may take place in a number of different ways:

Direct Discrimination - Where a person is treated less favourably than others whose circumstances are not materially different, save for the characteristic which motivates the less favourable treatment including:

- Advertising jobs as being accessible only to young people or able-bodied people;
- Refusing to appoint someone because they are disabled;
- Excluding part-time staff from training/promotion opportunities;
- Disciplining or dismissing someone for being pregnant;
- Refusing to work in a customer's house because they are (or are suspected to be) of a particular sexual orientation.

Indirect Discrimination - Where a provision, criterion or practice is applied equally to all but adversely affects or favours one group and cannot be justified including:

- Setting minimum levels of qualifications and/or experience which are unnecessary (indirectly discriminating against women who have had career breaks or against foreign nationals).

Victimisation – Where a person subjects another (the victim) to less favourable treatment on the grounds that they have made or are expected to make a complaint or claim of unlawful discrimination or to support another in such a complaint or claim. Examples may include:

- Disciplining someone for bringing a complaint under the Sex Discrimination Act 1975;
- Ostracising someone for being a witness in support of an employee who has alleged racial harassment;
- Being awkward or uncooperative with a customer who has complained of offensive and discriminatory language being used.

Harassment – unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them including:

- Displaying pornographic material or racist cartoons;
- Unwanted touching (including sexual touching) or unnecessary closeness;
- Verbal abuse, name-calling, spreading offensive rumours etc.;
- Unwarranted disciplinary or capability proceedings;
- Verbal, physical or psychological bullying.

Such behaviour by employees will result in disciplinary action; and by any other individual, company, partnership or organisation will result (in appropriate cases) in the termination of or withdrawal from relevant contracts/works. Such behaviour may also result in criminal proceedings and/or legal action against both the individual and the Anglian Group. The Anglian Group absolutely will not support any individual found by a court or tribunal to have discriminated against another.

More detailed information is available from the Anglian Group's Bullying and Harassment policy, the intranet, managers or the Human Resources Department.

IMPLEMENTATION

In order to implement this policy the Anglian Group shall:

- Ensure that appropriate training in equal opportunities is provided and that training is regularly updated;
- Communicate the policy to others as set out above;

- Set out the policy in full in the Anglian Group staff handbook;
- Display the policy on all workplace notice boards;
- State on all internal and external job advertisements that the Anglian Group is an equal opportunities employer and publish the 'two ticks' symbol to encourage applications from disabled candidates;
- State on all advertisements for goods or services that the Anglian Group is an equal opportunities provider of goods and services;
- Incorporate equal opportunities notices into general communications (e.g., point of sale literature, staff newsletters, intranet);
- Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff;
- Obtain commitments from other persons, companies, partnerships or other organisations that they too will comply with the policy in their dealings with our organisation and our workforce;
- Ensure that adequate resources are made available to fulfil the objectives of the policy.

MONITORING AND REVIEW

In order to ensure the effective operation of the equal opportunities policy (and for no other purpose) we will establish appropriate information and monitoring systems.

The monitoring systems and the policy itself will be reviewed and analysed annually (or more frequently if appropriate) and action taken as necessary. For example, where monitoring reveals an under-representation of a particular group or groups, an action plan will be developed to redress the imbalance.

COMPLAINTS

Employees who believe that they have suffered any form of discrimination, harassment or victimisation are encouraged to raise the matter through the Anglian Group's grievance resolution procedure. A copy of this procedure is available from managers or the Human Resources Department.

Employees may also seek confidential advice and assistance from their HR contact.

Any other person or organisation which believes that they have suffered any form of discrimination is encouraged to raise the matter through the Anglian Group's Company Secretary.

All such grievances and complaints will be dealt with seriously, promptly and confidentially. Any person raising a grievance or complaint in good faith will be protected from criticism or victimisation.

The Anglian Group will strive to ensure that any complaints are satisfactorily resolved internally. Employees are expected to utilise this process through

which the Anglian Group is able to demonstrate its commitment to upholding this policy, under the following legislation:

- Equal Pay Act 1970;
- Sex Discrimination Act 1975;
- Race Relations Act 1976;
- Disability Discrimination Act 1995;
- Employment Rights Act 1996;
- Employment Equality (Sexual Orientation) Regulations 2003;
- Employment Equality (Religion or Belief) Regulations 2003;
- Employment Equality (Age) Regulations 2006.

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