

## Diversity Policy

**The Purpose of the Policy:** This policy is to ensure the fair treatment and dignity of all employees at work. It is intended to prevent all forms of offensive and unfair behaviour whether or not such behaviour is unlawful. Harassment, bullying, discrimination and denial of equal opportunity are harmful to employees and can subject individuals to fear, stress and anxiety. Individuals who are harassed, bullied, discriminated against or denied equal opportunities are often made to feel vulnerable and may be reluctant to complain

### Policy Statement

Interface Environment Management Ltd (IEM) is committed to encouraging diversity and eliminating discrimination in both its role as an employer and as a provider of services.

IEM aims to create a culture that respects and values each other's' differences, that promotes dignity, equality and diversity and that encourages individuals to develop and maximise their true potential.

### Policy summary

01. The purpose of this policy is to provide equality and fairness for all in our employment and in the provision of services and not to discriminate on the grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.
02. Interface Environment Management Ltd opposes all forms of unlawful and unfair discrimination.
03. All employees, whether part-time, full-time or temporary, will be treated fairly and with respect.
04. Selection for employment, promotion, training or any other benefit will be on the basis of skills and ability.

### Principles

**Interface Environment Management Ltd 's commitment to Equality and Diversity is:**

01. To create an environment in which individual differences and the contributions of all our employees are recognised and valued.
02. To create a working environment that promotes dignity and respect for all.
03. No form of intimidation, bullying or harassment will be tolerated.
04. To ensure training, development and progression opportunities are available to all.
05. To promote equality in the workplace, which it believes is good management practice and makes sound business sense.
06. To regularly review all employment practices and procedures to ensure that no job applicants or staff, are treated less favourably than others.
07. To regularly review services to ensure they are accessible and appropriate to all groups within society.
08. To treat breaches of the equality policy seriously and to take disciplinary action when required.
09. To provide information and training to all employees so that they are fully aware of the issues relating to Equality and Diversity and their responsibilities relating to it.
10. To develop an Equality Action plan that ensures our Equality and Diversity policy is fully implemented.
11. To ensure the policy is fully supported by Senior Management.
12. To monitor and review the policy annually.

### Management responsibilities

*The Company and its management have a responsibility for:*

01. Communicating the policies on harassment, discrimination, diversity and equal opportunities;
02. Ensuring that the above policies are implemented;
03. Investigating any instances of harassment, discrimination and denial of equal opportunities and resolving them as quickly as possible;
04. Ensuring that the working environment is free from a culture where harassment, discrimination and denial of equal opportunities can develop.
05. Endeavouring to develop a working environment free from discrimination, harassment and victimisation, denial of equal opportunities, where everyone will receive equal treatment, regardless of gender, colour, race, ethnic and national origins, nationality, disability, age, marital status, sexual orientation, & religious or cultural beliefs.
06. Declaring that discrimination, harassment or victimisation of any kind will not be tolerated and deal with such behaviour through the disciplinary procedures hereinafter mentioned.

### Positive action

01. It is our Policy to act positively in using the Equality and Diversity Policy as a means of making public it's commitment to provide equal opportunities to all present and future employees.
02. IEM encourages all employees to apply for suitable opportunities and to seek training for promotion or in particular skills.
03. The Equality and Diversity Policy forms part of the Staff Handbook and Terms and conditions of Employment.
04. Training in Equality and Diversity is provided as part of the Induction Programme.
05. Any form of discrimination by an employee, is treated very seriously and where appropriate will be dealt with using the Disciplinary Procedure.
06. Interface Environment Management Ltd aims to ensure that all management reflect the diversity of the population of Interface Environment Management Ltd

### *the standards required and expected from all employees by:*

1. Emphasising the need to treat everyone fairly;
2. Drawing attention to the many forms of harassment, discrimination and a denial of equal opportunities at work and their serious adverse effect;
3. Making explicit the types of behavior that will not be tolerated;
4. Providing practical guidance to all employees on how to deal with harassment, discrimination and a denial of equal opportunities.

IEM recognize that everyone is different and has something unique to offer and as such wishes to respect and understand these differences and make the most of everyone's talents, hence the need for Diversity to be included in this Policy. However while being willing to accommodate diversity of all kinds, the prime concern of the management team in all situations will be the business needs of Company and that will always come first in order to protect both the Company and the employees it supports. The underlying principles of this policy will also apply when recruitment and interviewing is being carried out.

Please read the following procedure

## PROCEDURE

### Legal implications

Staff must report instances of racial, sexual, disability discrimination, harassment, victimisation and denial of equal opportunities to the Company otherwise this may lead to legal action against the Company. The Company may be directly liable by statute for employees' actions, if committed in the course of their employment, regardless of whether or not the employer was aware of this or approved it.

### Complaints procedure

The aim of this policy is to stop undesirable and offensive behaviour. Where appropriate, every effort will be made to resolve the situation informally although it should be recognised that some incidents, by their serious nature, will need to be dealt with under the formal procedures immediately. Complaints should be made as soon as possible after the incident(s).

### Informal procedures

Employees are advised to keep a written record of the incidents including the following:

1. Time, date and place the incident occurred,
2. A full description of what happened and
3. Name(s) if known of the alleged perpetrators and any witnesses

There are a number of ways of dealing with incidents of harassment, discrimination and bullying which include:

1. Telling the person(s) involved that the behaviour in question is offensive and unwanted and must stop immediately;
2. Reporting the matter to your Manager and asking him/her to respond informally by speaking to the alleged perpetrator. Consideration may also be given by the Manager to deal with the issue indirectly without mentioning that a complaint has been made and/or by re-arranging desks or work allocations to reduce the risk of contact;
3. Managers may wish to raise the complaint in an informal way and clearly inform the employee that harassment, discrimination and denial of equal opportunities are disciplinary offences.

### Formal procedures

1. An employee who feels that they or others have been harassed, discriminated against or denied equal opportunities, may make a formal complaint by using the grievance procedure;
2. Any complaint should be made in writing to the immediate Manager;
3. If the complaint is about your immediate Manager, then you should intimate your complaint to a Director.
4. The person in charge of dealing with the complaint will conduct an investigation;
5. The person against whom the allegations are made and the complainant will be interviewed separately.
6. The proceedings will be confidential.
7. Both the person against whom the allegations are made and the complainant may be accompanied at all stages of the procedure by a consenting fellow employee of their choice.
8. The investigation will be completed as soon as practicable;
9. Accurate records will be made of the investigation and its conclusion.
10. The person in charge of dealing with the complaint will write to the complainant and the person against whom the allegations are made, detailing the findings of the investigation and the action to be taken. This letter will contain an undertaking that the complainant will not be victimised or suffer any detriment.

If the complainant is **dissatisfied** with the outcome then he/she must submit a written request to the Director responsible for personnel to reconsider the outcome. Said request must be made within 5 working days of receiving of the decision. The Director's decision will be made in writing to both the person against whom the allegations are made and the complainant at the conclusion of the investigation.

If it is found that disciplinary action is justified then the Director's decision will be notified to the complainant and the person against whom the allegations are made together with the summary of the evidence, which led to this conclusion. A disciplinary hearing will normally be convened within 10 working days and the person against whom the allegations are made will have the opportunity to challenge any of the evidence and/or make any submissions in mitigation and in accordance with the Company's disciplinary procedure.

## RESPONSIBILITIES

### Employee's responsibilities

All employees have a responsibility to ensure that they do not behave in a way that could be offensive to others or to allow others to do so. Employees can contribute by developing an awareness and sensitivity towards the issue and by ensuring that standards of conduct for themselves and for colleagues do not cause offence.

### Management Key Performance Indicators (of successful procedure)

**Directors and Managers will visibly:**

- Challenge unacceptable behavior
- Create a culture where complaints can be raised without fear of reprisal
- Take firm action where unfairness or inconsistency exists
- Encourage and support diversity within employees
- Demonstrate considerate and fair behavior
- Treat staff with dignity and respect
- Recognize the value that individual skills and contributions make to the Company
- Demonstrate through their actions that diversity is an integral part of the workplace environment
- Create an environment in which staff are able to identify and share good business practice
- Celebrate successes together
- Encourage positive attitudes towards diversity

### Communication

Management will ensure that this policy and procedure is made available to all members of staff through team meetings.

### Contravention of Policy.

Any employee who feels that they have been unfairly treated contrary to this policy and procedure should in the first instance raise the issue with their line manager. If matters are not rectified to the individual's satisfaction then a grievance can be raised through the formal grievance procedure.

### Grievance and Disciplinary Procedures

Interface Environment Management Ltd will take seriously any complaints of discrimination and will not victimize people who make such complaints.

Staff will be made aware as part of the induction process of their responsibilities in relation to Equality and Diversity and that discriminatory behaviour will be fully investigated and dealt with using the Disciplinary Procedure.

### Bullying and Harassment

- Interface Environment Management Ltd upholds the right of all employees to be treated with respect and dignity and to work in an atmosphere free of bullying and harassment.
- All employees are responsible for ensuring that their own behaviour is sensitive to others and for ensuring that they do not condone or support the bullying or harassing behaviour of others.
- All complaints of bullying and harassment will be treated seriously and should be raised using the Grievance Procedure.
- All complaints will be investigated and where appropriate, the Disciplinary Procedures will be followed.

### Advertising and Recruitment

Interface Environment Management Ltd will use a range of advertising methods in order to attract the widest pool of appropriate applicants. Vacancies for new and existing jobs will normally be advertised internally and externally. We will encourage "organic growth" i.e. an existing member of staff recommending a friend or relative.

#### All our advertising will:

01. Contain the statement Interface Environment Management Ltd is an 'Equal Opportunities Employer'.
02. Ensure that we do not exclude, discriminate against, or discourage any particular group from applying nor make it difficult for any one from such a group to apply.
03. Refer to the job description and person specification in order give information about the requirements of the job.
04. Give clear instructions about obtaining the application pack.

### Recruitment

#### Job descriptions and person specifications

Job descriptions and Person Specifications will be prepared for all posts. The job description indicates the responsibilities and tasks to be undertaken by the job holder. The Person Specification describes the qualifications, skills and abilities required. A list of preferred criteria may also be prepared. Care will be taken to ensure that neither the description nor the specification are discriminatory on the grounds quoted in the Policy Statement.

### Interviewing

- All interviews will be carried out by a minimum of 2 people, the names and gender of interviewees will be made available in advance.
- The questions asked will seek to gather objective evidence in support of the job description and person specification. Similar questions will be asked of all candidates applying for the job.
- Disabled candidates will be asked if they need support during the interview process or adjustments should they be offered the position.
- Notes will be taken and evidence gathered against the job description and person specification

### People with disabilities

- Interface Environment Management Ltd will make genuine efforts to recruit people with disabilities and take reasonable steps to make the workplace and individual jobs accessible to people with disabilities.
- Interface Environment Management Ltd will regularly review its facilities for disabled employees and will try to overcome any problems faced wherever practicable and within reasonable resources available.
- Interface Environment Management Ltd will ensure that people have maximum access to employment opportunities and to meetings and events, regardless of any disability.

### Induction and training

- All employees will be required to follow an appropriate induction process to ensure they are equipped to do the job.
- All employees, will receive training on the Equality and Diversity policy, procedures and action plan as part of their induction.

### Training

- All employees will have access to a wide range of training opportunities
- Training opportunities will be discussed during supervision sessions and selection for training will be made on the basis of both the needs of the business set out in the Business Plan and the personal development of the individual.
- Special needs and requirements for people with disabilities or caring responsibilities will be taken into account whenever practicable and methods sought to help them overcome disabilities in taking up training opportunities.
- Staff with management, recruitment and selection responsibilities will be given guidance in the implementation of the **Equal and Diversity Policy** to ensure that they understand their position in law and under the Organisation's policy.
- Induction training will include an explanation of this Diversity and Equal Opportunities Policy and a requirement to undertake formal training within the probationary period of employment.

### Cultural and religious needs

Where employees have particular cultural and religious needs, Interface Environment Management Ltd will consider whether it is reasonably practicable to meet these needs while maintaining the efficiency of the business

### Annual Leave and Religious Holidays

Interface Environment Management Ltd will not ask about an employee's religion and will not discriminate against anyone wishing to celebrate their festivals. Employees are required to use part of their annual holiday entitlement to cover time off for these and must follow the normal holiday booking procedure. *The Company still retains right to refuse as in any other request for Annual Leave, if such absence has negative impact on the working of a site.*

## In Summary - Definition of harassment, discrimination and equal opportunities

### Discrimination

You can't be discriminated against because of your:

gender	colour	gender reassignment	religion or belief
disability	race	pregnancy and maternity leave	ethnic background
nationality	age	marriage or civil partnership	sexual orientation

**Diversity** - Diversity is about understanding, recognising, respecting and valuing differences. It is about managing differences so that everyone has equality of opportunity through a fair and consistent approach to the application of rules, policies and procedures. We recognise that this may mean treating some people differently (*IN A POSITIVE WAY*) in order to protect their individual rights.

**Harassment** - This is unwanted conduct affecting the dignity of employees at work. This includes unwelcome verbal, non-verbal and physical conduct.

**Direct discrimination** – This is where someone treats another less favourably on the grounds of gender, disability, colour, race, nationality, ethnic and national origins, marital status, religious or cultural beliefs, age, employment status, political belief, trade union membership, sexual orientation or religion.

**Indirect discrimination** - This results from the application of a requirement or condition equally to men and women, which is such that the proportion of, for instance, women who can comply with it is considerably smaller than the proportion of men. Where the women cannot comply with the condition/requirement and suffer a detriment then this will give rise to a claim for indirect discrimination unless the condition/requirement can be justified by the employer. This can include unfair allocation of work, unequal treatment in the application of conditions of employment, unreasonable pressure to complete tasks, exclusion from conversations and normal workplace activities or social events and unreasonable withholding of permission to attend self-organised groups within the workplace.

**Racial harassment** - This can include racial abuse of a physical, verbal or prejudicial nature, racist jokes, insults, ridicule or name calling of a racist nature, display of racially offensive written or visual material including graffiti and open hostility to other racial groups all on the grounds of race, colour, nationality, ethnic or national origins.

**Sexual harassment** - Sexual harassment is unwanted, unreasonable and offensive conduct of a sexual nature or other conduct of a sexual nature affecting the dignity of employees at work. This can include physical conduct such as touching, patting, pinching, brushing up against another person's body, and invasion of another person's body space. It can also include verbal conduct such as unwelcome sexual advances, propositions, pressure for sexual activity, suggestive remarks, innuendoes or lewd comments/jokes of a prejudicial nature, unwanted comments on dress or appearance. Finally sexual harassment can also include non-verbal conduct such as displays of pornographic or sexual suggestive pictures, objects of written material, leering, whistling or sexually suggestive gestures. Such displays can be on paper or seen visually from a PC.

**Disability discrimination** - A disabled person is someone who has a physical or mental impairment, which has a substantial and long-term adverse affect on his/her ability to carry out normal day-to-day activities. Disability discrimination can arise where a disabled person is treated less favourably than a non-disabled person. This can include threatening or patronising language, action or behaviour including disablement jokes, inappropriate comments and questioning regarding a person's impairment, and the denial of the individual identity of a disabled person. Disability discrimination can also arise where the employer fails to identify and/or implement facilities or requirements for the disabled person in order for them to perform their duties.

**Equal opportunities** – This applies to recruitment and selection, through training and development, appraisal and promotion, to retirement. New employees should be selected on a fair and non-discriminatory basis relating specifically to the individual's ability and aptitude to do the job. It is the Company's aim to ensure that no applicant or employee shall receive less favourable treatment than another on the grounds of gender, colour, race, ethnic or national origins, nationality, disability, age, marital status, sex, religious or cultural beliefs, employment status, political beliefs, trade union membership, sexual orientation or religion. All employees will be given equality of opportunity within the Company service and will be encouraged to progress within that organisation and, where appropriate, employees of either sex under-represented groups are given training and encouragement to achieve equal opportunity within the Group. Any promotion will relate specifically to the individual's ability and aptitude to do the job.

Staff must report instances of racial, sexual, disability discrimination, harassment, victimisation and denial of equal opportunities to the Company otherwise this may lead to legal action against the Company. The Company may be directly liable by statute for employees' actions, if committed in the course of their employment, regardless of whether or not the employer was aware of this or approved it.

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