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**Aray Wellbeing Ethics & Equal Opportunities Policy**

N.B. Please note that Aray Wellbeing Community Interest Company is also referred to as Aray.

**General Principles**

The purpose of this Ethics and Equal Opportunities Policy is to communicate our commitment to proper conduct and equality of opportunity in employment.

The company (refers to Aray as a social enterprise) and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The company will conduct its business in a competent, fair, impartial, and efficient manner.

With the aims of ensuring that all board members, employees, volunteers and job applicants are treated fairly and equally, and supporting the Company’s objective of providing a working environment that is free from all forms of discrimination. The policy applies to all staff within the Company, including employees and other workers, such as agency workers, temporary workers, volunteers and contractors. All person working for or on behalf of Aray are expected to put this policy into practice.

The Company is fully committed to providing equality in the workplace and all opportunities for, and during employment, will be afforded to individuals fairly and irrespective of age, disability, gender, gender reassignment, marital or civil partnership status, pregnancy or maternity, race including colour, ethnic or national origins and nationality, religion or belief or sexual orientation (“the protected characteristics”). We aim to create a working environment that is free from discrimination and harassment in any form, in which all staff, customers, visitor, guests, contractors and suppliers are treated with dignity and respect.

The Company will not unlawfully discriminate in the arrangements we make for recruitment and selection or in the opportunities afforded for employment, training or any other benefit. All decisions will be made fairly and objectively. We aim, as far as reasonably practicable, to ensure that all our working practices are applied fairly and consistently and, where necessary, we will take reasonable steps to avoid or overcome any particular disadvantage these may cause and to promote equality.

**Health and Safety**

The company is committed to providing a safe and healthy working environment for all of its employees both on and off its sites (includes events organised by the company). There is a programme of regular health and safety audits and safety training. The company applies its standards to all visitors/guest to its sites. We have basic insurance provided to cover any accidents, that may happen at any of our sites (as outlined above).

**Environment**

The company respects the environment and the need to protect it and minimise the impact its operations have on it. It is engaged in a continuous programme of improvement on environmental issues and opens itself to independent third-party verification, inspection, and certification of its progress.

**Employees**

In the case of this ethics and equal opportunity policy. Employees are equal to any members/volunteers that have signed up and given their personal information for the retention of company file.

All employees are treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age, or national origin. Employees are offered a safe and healthy workplace and the company will not tolerate any form of harassment.

**Customers**

The company will take all reasonable care to avoid misleading statements, concealment, and overstatement in all of its advertising and public statements. It will seek to build long term partnerships with its customers by being honest and straightforward in its dealings at all times. It will respect the confidentiality of any information it may obtain in relation to its customers.

**Suppliers**

Suppliers will be chosen on the basis of factors such as price, quality, delivery, service, and integrity. The company’s choice of suppliers will be made objectively. Honesty and openness will be paramount in the company’s dealings with its suppliers.

**Competitors**

The company will build its reputation on the basis of its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors either directly or by implication.

**Government, Regulators, and Legislators**

The company will seek to comply with all international, national, and local legislation affecting its operations. It will strive to follow the best practice in corporate governance. It will meet its tax obligations. It will not make any financial contributions or offer support to any political party.

**Giving and Receiving Gifts and Entertainment**

Board Members, employees & volunteers will neither seek nor accept for themselves or others any gifts, favours, or entertainment without a legitimate purpose from any person or business organisation that does or seeks to do business with. Gifts accepted are to a retail value of no more than £50, anything higher need to be discussed and reviewed by the board. Gifts, favours, and entertainment may be given to others at the expense of the company as long as these are consistent with customary business practice and are not excessive in value.

**Bribes and Corrupt Practice**

The company does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form. The company has a separate Bribery Policy in place which examines in detail the procedures all employees must follow to avoid involvement in any situation which might lead to the offer of bribes. The policy makes it clear that any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution.

**Forms of discrimination**

The following are forms of discrimination that this policy aims to avoid:

Direct Discrimination occurs when a person is treated less favourably because of a protected characteristic that they either have or are thought to have. Direct discrimination can also occur by way of association, which is when a person is treated less favourably because, for example, their spouse or partner or other relative has the protected characteristic.

Indirect Discrimination occurs when a provision, criterion or practice is applied equally to everyone, but has a disproportionately adverse effect on people who share a particular protected characteristic. A person with the protected characteristic who is disadvantaged in that way has the right to complain. To be justified the provision, criterion, or practice must be necessary for legitimate business reasons in circumstances where less discriminatory alternatives are not reasonably available.

Victimisation occurs where someone is treated unfavourably because he/she has raised a complaint under this policy or taken legal action, in relation to any alleged act of unlawful discrimination, against the Company or because he/she has supported someone else in doing this.

Harassment is unwanted conduct that violates an individual’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Harassment can take many different forms and may involve inappropriate actions, behaviour, comments, emails or physical contact that causes offence or are objectionable.

Harassment may involve a single incident or persistent behaviour that extends over a period of time and can occur even if someone did not mean to cause offence. It also means that a person can be subjected to harassment by behaviour that is not aimed at them directly but which they nonetheless find unpleasant. Harassment is always unacceptable and where it relates to a protected characteristic it will amount to an unlawful act of discrimination.

Discrimination arising from Disability - In addition to the above, it is unlawful to treat a person unfavourably because of something that is the result, effect or outcome of their disability, unless the treatment is necessary and can be objectively justified. Furthermore, employers have a duty to make reasonable adjustments to ensure that disabled applicants, employees or other workers are not substantially disadvantaged.

**Recruitment and selection**

Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and will be based upon specific and reasonable jobrelated criteria. Decisions regarding an individual’s suitability for a particular role will be based on aptitude and ability. We will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled applicants are not substantially disadvantaged. We also support agile working. The Company will consider taking appropriate positive action to enable or encourage applications from persons with a protected characteristic that is under represented in the organisation.

**Career development and training**

All staff will be given an appropriate induction to enable them to fulfil the responsibilities of their role. All employees will be encouraged to develop their full potential and we will not unreasonably deny an employee access to training or other career development opportunities, should it be deem necessary to carry out their role and in some case be brought before the board to review. These will be determined objectively, taking into account the needs of the business and available resources. Selection for promotion will be based on objective criteria and decisions will be made on the basis of merit.

**Raising a complaint of discrimination**

If you believe you have been discriminated against, you should raise the matter in accordance with the Company’s Grievance Procedure. Please inform the founder or any board members. Any employee/volunteer who is found to have committed an act of discrimination, or breached this policy in any other way, will be subject to action under the Disciplinary Procedure, up to and including dismissal. Non–employees will be subject to appropriate formal action that may, depending on the circumstances, involve terminating any contract or agreement. The Company will also take seriously any malicious or, in its opinion, unwarranted allegations of discrimination and will take appropriate action, disciplinary or otherwise, where necessary.

Any questions about the policy should be directed to the founder and director Dr Julia Jones.

This policy is regularly reviewed annually, however it may be amended at any time.

**Version 1**

**Signed: Dr Julia Jones 2nd Jan 2020**