

**1.0 SCOPE**

- 1.1** This policy applies to all employees and is applicable to both the Brandon and Nazeing sites.

**2.0 POLICY STATEMENT:**

- 2.1** Lignacite Ltd is an equal opportunity employer and is fully committed to a policy of treating all of its employees and job applicants equally.

The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

- 2.2** The company is fully committed to encouraging equality, diversity and inclusion in the workplace, and to creating a workplace free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

- 2.3** The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this policy, these are referred to as the "protected characteristics".

- 2.4** Employees have a duty to co-operate with the company to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination.

Action will be taken under the company's disciplinary procedures against any employee who is found to have committed an act of improper or unlawful discrimination. Serious breaches of this equal opportunities policy statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal.

Employees should bear in mind that they can be held personally liable for any act of unlawful discrimination, bullying, harassment and victimisation.

**3.0 DIRECT DISCRIMINATION:**

- 3.1** Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

- 3.2** The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic.

In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.

- 3.3** Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

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#### **4.0 INDIRECT DISCRIMINATION:**

- 4.1** Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees, but which is discriminatory in its effect on, for example, one particular sex or racial group. Indirect discrimination occurs when there is applied to the job applicant or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant or employee.

A PCP is discriminatory in relation to a protected characteristic of the job applicant or employee if:

- It is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic
- The PCP puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage, when compared with persons with whom the job applicant or employee does not share it
- It puts, or would put, the job applicant or employee at that disadvantage, and
- It cannot be shown by the company to be a proportionate means of achieving a legitimate aim.

- 4.2** The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

#### **5.0 VICTIMISATION, HARASSMENT AND BULLYING:**

- 5.1** Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have raised or supported a grievance or complaint of unlawful discrimination, or because they have issued employment tribunal proceedings for unlawful discrimination, or they have given evidence in connection with unlawful discrimination proceedings brought by another employee.

However, an employee is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith.

- 5.2** Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.
- 5.3** The business will take seriously all complaints of bullying, harassment and victimisation by fellow employees, customers, suppliers, visitors and others in the course of the organisations work activities.

Such acts will be dealt with as misconduct under the company's grievance and disciplinary procedures and appropriate action shall be taken. Particularly serious complaints could also amount to gross misconduct and lead to dismissal without notice.

Furthermore, sexual harassment may amount to both an employment rights matter and a criminal matter. In addition, harassment under the Protection From Harassment Act 1997, which is not limited to circumstances which relate to protected characteristics, is a criminal offence.

- 5.4** The Company will take all reasonable steps to eliminate victimisation in all aspects of employment.

#### **6.0 RECRUITMENT, ADVERTISING AND SELECTION:**

- 6.1** The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications.

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The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

**6.2** Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

**6.3** Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

**6.4** However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Company will apply that requirement to the job role and this may therefore be specified in the advertisement.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.

Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

**6.5** With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

**6.6** If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

## **7.0 TRAINING AND PROMOTION:**

**7.1** The Company will train all line managers in the company's policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices.

Line managers will be responsible for ensuring they actively promote equality of opportunity within the departments for which they are responsible.

**7.2** The company will also provide training to all employees to help them understand their rights and responsibilities in relation to equal opportunities and what they can do to create a work environment that is free from discrimination.

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- 7.3** Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice.

When a group of workers who predominantly have a particular protected characteristic appear to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

**8.0 TERMS OF EMPLOYMENT, BENEFITS, FACILITIES AND SERVICES:**

- 8.1** All terms of employment, benefits, facilities and services will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

**9.0 EQUAL PAY AND EQUALITY OF TERMS:**

- 9.1** The Company is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out like work, work rated as equivalent or work of equal value.

In order to achieve this, the Company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

**10.0 REPORTING COMPLAINTS:**

- 10.1** All allegations of discrimination will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of unlawful discrimination from employees.

**11.0 MONITORING EQUAL OPPORTUNITY:**

- 11.1** The company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity is being achieved.

This will also involve considering any possible indirectly discriminatory effects of its working practices.

If changes are required, the Company will implement them. The company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

**12.0 ASSOCIATED DOCUMENTATION:**

- 12.1** The following policies have applicability to this document:

- CCTV Policy
- Working Time Policy
- Data Protection Policy
- Mental Health and Wellbeing Policy
- Menopause Policy
- Information Security Policy
- Anti-Bullying, Harassment and Victimisation Policy
- Recruitment Policy

Signed:.....*C. de Lotbiniere*.....  
GAJ de Lotbiniere, Chairman

Date:.....*28/4/25*.....

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