1.0 OUR COMMITMENT

The Company recognises the value of a diverse workforce and is committed to providing equal opportunities within the workforce and eliminating unlawful discrimination. The company's aim is to have a workforce which is fully representative of all sections of society and that each member of staff feels respected and able to give their best.

The policy is intended to assist the Company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

The Company strives to ensure that every member of staff has a working environment that promotes dignity and respect, and individual differences and contributions of staff are recognised and valued.

This policy applies to all job applicants, contractors, agency workers, bank workers and all staff members who have a contract of employment with Outcomes First Group. The policy does not give contractual rights to individual staff members and the company reserves the right to alter any of its terms at any time.

Implementation
It is the responsibility of line managers to ensure that staff members are aware and understand this policy and any subsequent revisions to the guidance.

Compliance: This policy complies with all relevant regulations and other legislation as detailed in the Compliance with Regulations & Legislation Statement.

2.0 TERMS OF REFERENCE

<table>
<thead>
<tr>
<th>Definition</th>
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</tr>
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<tbody>
<tr>
<td>Equality Act 2010</td>
<td>Legally protects people from discrimination in the workplace.</td>
</tr>
<tr>
<td>Direct Discrimination</td>
<td>Treating one person less favourably than another, because of, for example race or gender</td>
</tr>
<tr>
<td>Indirect Discrimination</td>
<td>Creating a condition or requirement which cannot be shown to be justifiable and which in practice precludes certain groups from being considered.</td>
</tr>
<tr>
<td>Associative Discrimination</td>
<td>Is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic</td>
</tr>
</tbody>
</table>
### Perceptive Discrimination

Is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic.

<table>
<thead>
<tr>
<th>Victimisation</th>
<th>Occurs where an employee is subjected to a detriment, such as being denied a training opportunity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Failure to make reasonable adjustments</td>
<td>Is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that disability</td>
</tr>
<tr>
<td>Bullying &amp; Harassment</td>
<td>Occurs in cases where a member of staff is subject to abuse or unfair treatment by another person. Please refer to the Bullying &amp; Harassment policy</td>
</tr>
</tbody>
</table>

### 3.0 PURPOSE

The purpose of the policy, is to:

- Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
- Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.
- The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, working conditions, terms of employment, and selection for redundancy.

### 4.0 OUR RESPONSIBILITIES

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

The Company will consider any possible indirect discriminatory effect of its standard working practices. This includes the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the organisation considers it has good reasons, unrelated to any protected characteristic, for doing so. The Company will comply with its obligations in relation to statutory requests for contract variations.

The Company will make reasonable adjustments to its standard working practices where possible to accommodate disabled employees. Staff members are encouraged to inform their manager if they consider themselves to have a disability in order for adjustments to be explored.

The Company will try to accommodate cultural or religious practices such as prayer requirements where we reasonably can.
5.0 YOUR RESPONSIBILITIES

Every employee is required to assist the organisation to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination. It is line managers’ responsibilities to ensure that staff members are aware of and understand the policy.

Employees can be held personally liable as well as, or instead of, the organisation for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the organisation's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

6.0 GRIEVANCES

If you consider that you may have been unlawfully discriminated against, you may use the organisation's grievance procedure to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the bully and harassment policy.

The Company will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

7.0 MONITORING & REVIEW

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law. In particular, the Company will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the Company will implement them.