



Owls Hall Environmental – PL-008 Equal Opportunity Policy

This Equal Opportunities Policy has been applied to Owls Hall to promote a welcoming and friendly working atmosphere, minimise any inappropriate practices that may be unlawful, and to promote Owls Hall as a modern business prepared for the future.

Owls Hall Environmental Limited is committed to a policy of equal opportunities and non-discrimination. All employees are required to comply with the Company's policy on equal opportunities. Any employee found to be in breach of the procedure, including discriminating, bullying or harassing another employee or any third party associated with the Company, or inducing or instructing another employee to breach the policy, will be subject to the Company's Disciplinary Procedure.

There are official notice boards located around the Company. The notice boards regularly display important notices and items of interest and will detail the Company's Equal Opportunities. Please pay attention to the notices displayed as the Equal Opportunities Policy will be regularly reviewed and updated where necessary.

Introduction

Owls Hall Environmental Limited is an equal opportunities employer, and is committed to, and promotes its policy of equality of opportunity through the equal treatment of its employees and job candidates, as well as to opposing all forms of discrimination in the workplace.

Owls Hall Environmental Limited policy is to comply with all legislation relating to equality of opportunity and treatment, particularly the following legislation and any subsequent amendments or re-enactments:

- The Equality Act 2010
- Provisions under the Rehabilitation of Offenders Act 1974
- The Human Rights Act 1998.

Owls Hall Environmental Limited will not tolerate any acts of discrimination based upon sex, sexual orientation, gender reassignment, marital status, pregnancy and maternity, nationality, colour, race, national origin, religion or belief, political conviction, age or disability. This policy is intended to:

- Ensure that all employees and potential employees are made aware that they are able to work in an environment that is free from discrimination;
- Ensure that no employee or potential employee is prevented from achieving his/her full potential in employment due to any act of discrimination;
- Promote a culture of equality of opportunity and treatment across all parts of the Company.

Owls Hall Environmental Limited will make decisions without reference to any unlawful discriminatory criteria.

A statement of Owls Hall Environmental Limited intent with regard to equality of opportunity and treatment is contained in all advertisements and publicity material as well as employee literature. A copy of the full Equal Opportunities Policy is available to all employees at any time.

No employee or job candidate will receive less favourable treatment or, for any reason, be disadvantaged by any conditions of employment or by any requirement of Owls Hall Environmental Limited that cannot be justified as being necessary and legitimate on operational grounds.



Owls Hall Environmental Limited employees are recruited without reference to sex, sexual orientation, gender reassignment, marital status, pregnancy and maternity, nationality, colour, race, national origin, religion or belief, political conviction, age or disability.

Owls Hall Environmental Limited will appoint, train, develop and promote employees on the basis of merit and ability, and will enable all employees to make full use of their talents and abilities.

Owls Hall Environmental Limited is committed to making reasonable adjustments to any job, working practice or working environment, so that individuals who are known to have disabilities are able to compete for positions on equal terms with others. The individuals themselves are responsible for ensuring that any disability is discussed with their Manager or Supervisor, in order that appropriate action can be taken.

Aim of the Equal Opportunity Policy

The aim of Owls Hall Environmental Limited is to:

- Comply with all relevant legislative and statutory duties relating to equal opportunities when advertising for, engaging, training, developing and promoting its employees as well as in the provision of services to its clients.
- Comply with all relevant codes of practice and codes of guidance on equal opportunities issued by the government or other relevant bodies from time to time.
- Provide information, guidance, instruction and training to its employees in relation to all aspects of the Company's Equal Opportunities policy.
- Where appropriate, provide employment opportunities for groups facing discrimination, both in respect of its direct labour force and its subcontractors.

Make a copy of the Equal Opportunities Policy available to all consultants, suppliers, subcontractors and other bodies acting for, or in partnership with Owls Hall Environmental Limited, and to examine any Equal Opportunities policy supplied by such parties to ensure that it accords with Owls Hall Environmental Limited own policy, taking all reasonable steps to ensure that such parties comply with the terms of this Equal Opportunities Policy, when engaged by, or in partnership with Owls Hall Environmental Limited.

Maximise the potential of all employees with regard to their personal development and their contribution to the organisation, irrespective of sex, sexual orientation, gender reassignment, marital status, pregnancy and maternity, nationality, colour, race, national origin, religion or belief, political conviction, age or disability.

Equal Opportunities

Owls Hall Environmental Limited recognises the value of, and encourages the recruitment of a diverse workforce. Wherever reasonably possible the company aims to ensure that its workforce reflects the community in which it is working.

The Owls Hall Environmental Limited Management recognises that it has a duty and responsibility to ensure that its Equal Opportunities Policy is consistently engaged and applied when recruiting employees.

Owls Hall Environmental Limited is committed to the regular review of its job application and recruitment procedures, to ensure that individuals are selected on the basis of their merits and abilities, and that no person is disadvantaged, either directly or indirectly, on discriminatory grounds.



Owls Hall Environmental Limited ensures that those staff who are responsible for recruitment and selection are properly trained in all aspects of the Equal Opportunities Policy, to ensure that there is no discrimination involved in the recruitment and engagement of employees.

It is the responsibility of all Managers and Supervisors to ensure the consistent application of the Company's Equal Opportunities Policy, and to maximise the potential of all employees with regard to their contribution to the organisation. Managers and Supervisors have a duty to ensure that this Policy is applied within any area under their control, and to consult the Company's outsourced Human Resources Department, if in any doubt as to the application of this Policy.

All employees will be made aware that:

- They must not engage in, or be associated with any act of discrimination against any other employee on account of his/her sex, sexual orientation, gender reassignment, marital status, pregnancy and maternity, nationality, colour, race, national origin, religion or belief, political conviction, age or disability
- All employees have a personal responsibility for the practical application of this Equal Opportunities Policy
- Special responsibility for the application and practice of this Equal Opportunities Policy falls upon Managers and Supervisors involved in the recruitment, selection, promotion and training of employees. These special responsibilities may give rise to a need for specific training of the Managers and Supervisors concerned, for which Owls Hall Environmental Limited will make relevant provision
- Owls Hall Environmental Limited Grievance Procedure is available to any employee who believes that he or she may be, or may have been, the victim of a discriminatory act. A copy of the Company's Grievance Procedure is available from the office
- Disciplinary action will be taken against any employee who is found to have committed an act of discrimination. Serious breaches of this Policy, including harassment of any employee, or any other person associated with Owls Hall Environmental Limited, will be treated as gross misconduct.

Discrimination

Employees must ensure that they do not discriminate, in word or in deed, whether directly or indirectly against any other employee, consultant, sub-contractor, supplier, or any other person associated with Owls Hall Environmental Limited, including customers and members of the public.

Disability

For the purposes of the Equality Act 2010, a disability is defined as a physical or mental impairment which has a substantial and long term adverse effect on a person's ability to carry out his or her normal day to day activities.

The Act makes it unlawful to discriminate against current or prospective workers who have a disability, or who have had a disability in the past. Owls Hall Environmental Limited recognises and complies with its duty under the Act to make reasonable adjustments to the workplace, work station or working environment to help a disabled person cope with his or her disability in the working environment.

It is the policy of Owls Hall Environmental Limited to treat any employee with a disability no less favourably than it would treat non-disabled employees, unless such treatment is "justified" under the provisions of the Act.



Owls Hall Environmental Limited will seek to appoint the best, most suitable person for the job. To this end, Owls Hall Environmental Limited is committed to ensuring fair and reasonable selection criteria and appointment procedures. It is committed to making reasonable adjustments to working practices and working environments to accommodate any individual with a disability.

Harassment

Harassment is defined as any unsolicited and unwelcome comment or action which is found to be objectionable to a person, and which could threaten an employee's job security, or create an intimidating, hostile or offensive working environment. Owls Hall Environmental Limited will not tolerate any act from any employee which is deemed to constitute any form of harassment.

What one person may find acceptable may cause offence to another. It is a matter for the person subjected to the harassment to decide whether such behaviour or conduct causes offence.

Owls Hall Environmental Limited regards the following as examples of actions that could be regarded as harassment, although this should not be regarded as an exhaustive list:-

- Sexual or racial banter
- Offensive jokes
- Unnecessary touching or unwanted physical contact
- Bullying or intimidatory behaviour, such as demeaning or threatening comments
- Verbal abuse
- Racist graffiti
- Demands for sexual favours/compromising or suggestive invitations
- Physical assault or other aggressive behaviour towards any other individual
- The display of any material or communication that has sexual or racial connotations
- Verbal or non-verbal conduct or other behaviour which is directed towards an individual because of his/her sex, sexual orientation, gender reassignment, marital status, pregnancy and maternity, nationality, colour, race, national origin, religion or belief, political conviction, age or disability.

Any alleged act of harassment will be thoroughly investigated and if substantiated, will result in disciplinary action being taken against the offender, which could include the termination of his/her employment.

Personal Policies and Procedures

Direct or indirect discrimination during employment will be treated as a disciplinary offence under Owls Hall Environmental Limited Disciplinary Procedure.

When joining Owls Hall Environmental Limited, employees will be provided at their induction meeting with a detailed summary of the Company's Equal Opportunities policy.

The Equal Opportunities policy will be updated regularly to take account of any new legislation, code of practice, issued by the Government or other bodies from time to time.

Responsibilities of Managers and Supervisors

Owls Hall Environmental Limited recognises that the successful application of its Equal Opportunities Policy depends on employees at all levels within the company. Employees are therefore made aware of what is expected of them by Owls Hall Environmental Limited, and of what is required by law, and are given continuous training and support.

Owls Hall Environmental Limited will carry out reviews and training to ensure that:-

- All Managers and Supervisors are briefed on their responsibilities and supported by training.



- All Managers and Supervisors who are responsible for selecting employees for training or for allocating work must ensure that no act of discrimination is made, either directly or indirectly.
- All employees are given equal opportunities for training, further education and personal development.
- All Managers and Supervisors promote equality of opportunity and treatment to their staff and encourage everyone to work together to eliminate all forms of discrimination and harassment.

Each employee has a responsibility to ensure that Owls Hall Environmental Limited achieves its aims of equality of opportunity. This Equal Opportunity Policy depends on everyone treating others with the respect and dignity they deserve and that they, in turn, would expect from others.

Owls Hall Environmental Limited Managers and Supervisors have particular responsibilities for ensuring a harmonious working environment. They are responsible for addressing and eliminating any situation that involves bullying, intimidation, harassment or any other form of discrimination, and are responsible for ensuring that the potential of all employees under their supervision and control is maximised.

Owls Hall Environmental Limited undertakes to provide the necessary support and training, including awareness of discrimination legislation and its impact on the decisions that Owls Hall Environmental Limited Managers and Supervisors make during the course of their duties.

Code of Practice on Equal Opportunities

The following Code of Practice relates to the application of the Owls Hall Environmental Limited Equal Opportunity Policy. It sets out how the Policy is to be applied throughout the Company.

There should be no discrimination by any employee against any person on the basis of sex, sexual orientation, gender reassignment, marital status, pregnancy and maternity, nationality, colour, race, national origin, religion or belief, political conviction, age or disability. All promotions are made strictly on the basis of the employee's ability to do the job.

Recruitment and Promotion

The recruitment process should result in the selection of the most suitable person for the job having regard to experience and qualifications.

It is against the Company's policy and against the law to discriminate either directly or indirectly on the grounds of sex, sexual orientation, gender reassignment, marital status, pregnancy and maternity, nationality, colour, race, national origin, religion or belief, political conviction, age or disability at any stage of the recruitment process. Managers and Supervisors involved in the recruitment process are responsible for ensuring that:

- All vacant positions are open to all applicants, except those positions for which a genuine occupational qualification is specifically defined and permitted. Advice should be sought from the Human Resources Department in this respect.
- No assumptions or pre-judgments are made in respect of the suitability of any candidate for a particular job based upon any unlawful discriminatory factor.
- No decision is made or preference stated in advance which could unfairly influence the outcome of the recruitment process.
- No variation will be applied to the terms, conditions or benefits on which a job is offered, as a result of any unlawful discrimination. All applicants including existing employees are made aware of this Policy and Owls Hall Environmental Limited other policies relating to Training and Local recruitment.



- In the event that an applicant has a disability, full consideration should be given to any reasonable adjustment to the job or working environment that may be necessary to enable that applicant to compete on equal terms with other, non-disabled applicants.
- All employees involved in the recruitment process are properly advised and trained in the implementation of this Policy.

Recruitment Advertisements

Owls Hall Environmental Limited will make every effort to ensure that Recruitment advertisements consistently and positively encourage applications from all suitably qualified and experienced people.

All advertisements must identify that Owls Hall Environmental Limited is an equal opportunities employer and that it offers opportunities at all levels to all potential applicants, without discrimination. Employees involved in the recruitment process are responsible for ensuring that:

- A copy of Owls Hall Environmental Limited Equal Opportunities Policy is provided to any recruitment and advertising agencies used by the Company.
- This Equal Opportunities Policy is referred to in all recruitment and publicity literature and in all internal and external advertisements, and that:
- Job titles and job content are set out without bias or discrimination
- Jobs are described in such a way that no suitably qualified or experienced person is deterred from applying
- Advertisements and publicity materials do not include any copy or illustrations that might indicate any form of stereotyping
- Illustrations showing people at work should portray a wide variety of individuals from various ethnic groups, and of both genders doing any job.
- Vacancies are advertised in a sufficient variety of media to ensure that all groups are informed (including advertising in other languages where appropriate), such as appropriate newspapers and periodicals, employment agencies that are experienced in the recruitment of minority groups, job centers and careers offices, schools, colleges and clubs.

The Selection Process

The selection process should be carried out consistently for all jobs at all levels within Owls Hall Environmental Limited, and must be fair and non-discriminatory, in compliance with the Company's Equal Opportunities Policy.

Application Forms

Application forms include only those questions that are deemed necessary at the initial stage of selection. All applicants are encouraged to use the prescribed form, copies of which can be obtained from the Office.

Owls Hall Environmental Limited will ensure that:

- All questions on the application form are relevant to the vacancy, are non-discriminatory, and essential to this stage of the process.
- No indirect discrimination should be made in respect of any applicant on the basis of postal code or address.

Managers and Supervisors who conduct interviews are encouraged to ensure that all questions are strictly limited and relevant to the job requirements. On no account will questions be asked or assumptions made about a person's personal and domestic circumstance. Where the



requirements of the job may affect the candidate's personal life (such as unsocial hours or extensive travel), this should be discussed objectively.

Managers and Supervisors who conduct selection interviews will be:

- Required to adopt an unbiased approach to all candidates to avoid discrimination
- Required to ask only questions which relate to the job and which are non-discriminatory.

Questions about domestic circumstances can be misinterpreted by candidates. Such questions should only be asked if they are truly relevant for the particular post (such as the job necessitating the candidate working late hours) and should be asked equally and consistently of all candidates.

Selection Criteria

Only those qualifications and skills that are important and relevant to the job are to be established as criteria for selection. They may include educational and professional qualifications, experience, the ability to communicate effectively and physical abilities, subject to Owls Hall Environmental Limited being able to demonstrate that they are necessary attributes for the position.

The candidate's previous experience and willingness to undergo further training should both be taken into account, particularly where the candidate lacks formal qualifications but can demonstrate suitability for the job in other ways. Those involved in the recruitment process are responsible for ensuring that:

- All selection criteria are strictly job-related and essential requirements of the job
- All relevant experience is taken into consideration
- A criterion that prevents a person with a disability from competing for or obtaining a position may only be justified if (after all reasonable adjustments have been considered either to the job, premises or recruitment process (including interview and selection criteria) to accommodate a disabled applicant) that person is not the best person for the job.

Educational and Professional Qualifications

In assessing educational qualifications, it should not be assumed that degrees or diplomas awarded by overseas universities or other academic bodies are of a lower standard than their UK equivalents.

Experience

Due recognition should be given to experience as a substitute for formal qualifications wherever possible. All employment and other experience should be taken into account, including paid employment, voluntary and community work, work within the home, family responsibilities and experience.

Rehabilitation of Offenders

Owls Hall Environmental Limited and its employees will not discriminate against anyone who has a "spent" conviction under the Rehabilitation of Offenders Act 1974 ("the ROA"). Under the ROA it is unlawful to refuse to engage or to dismiss a person on the grounds of a spent conviction.

The ROA applies only in certain circumstances, and certain professions are excluded from the scope of the ROA. In addition certain criminal offences and offences in contravention of the Companies Act and financial services legislation are excluded from the ROA. Employees should



consult their Manager if they are in any doubt about the applicability of this aspect of the Policy to them.

References given by Owls Hall Environmental Limited for employees will not refer to spent convictions. If those obtained for new employees contain a reference to a spent conviction, such reference will be ignored. No references to spent convictions are held in any of Owls Hall Environmental Limited computerised and manual records.

The Disciplinary Procedure

In any organisation it is essential that certain standards and levels of performance are maintained to ensure the smooth running of the Company and the well being of employees. The disciplinary procedure is designed to help and encourage all employees achieve and maintain acceptable standards of conduct, attendance and job performance. The aim is to ensure consistent and fair treatment for all employees who have been employed by the Company for one year or more.

Failure to meet standards of conduct by the employee may, initially, be brought to the employee's attention by their Manager in informal conversations, if this is appropriate.

In cases of poor job performance, the Company may elect to discuss this informally at first with the employee concerned. The employee's Manager would conduct this meeting. The purpose of this meeting is to establish the reasons for the poor job performance and identify and agree a mutually acceptable way forward. Such activities may include re-training, coaching or changing working procedures.

In all cases where disciplinary action is being considered, no decision will be reached and no disciplinary action will be taken, until such time as the matter has been fully investigated and the employee has been given the opportunity to state their case and to offer explanations. At all formal stages, employees have the right to be accompanied and will be given the opportunity to appeal against any disciplinary action taken.

Depending on the seriousness of the case, the disciplinary procedure may be entered into at any of the stages outlined below. Except in cases of gross misconduct, dismissal is unlikely to be the first step.

Training and Development

Employees will be provided with appropriate training regardless of age, sex, race, colour, ethnic or national origins, marital status, civil partnership, religion, disability and sexual orientation and equal training opportunities will be provided to both part and full time employees. All employees will be encouraged to discuss their career prospects and training needs with their Line Manager informally and formally

Monitoring

The cooperation of all employees is essential for the success of the policy. However, it is the responsibility of the Director to ensure that all aspects of this policy are kept under review and are operated throughout the organisation. Where it appears that applicants/ employees are not being offered equal opportunities or are being discriminated against, circumstances will be investigated to identify any policies, criteria or practices that exclude or discourage certain employees, and, if so, whether these are justifiable. Owls Hall Environmental Limited will regularly review the number of job applicants from different ethnic groups to ensure the successful practice of the Company's Equal Opportunities Policy.



Reporting

The Company emphasises that discrimination is unacceptable conduct which may lead to disciplinary action under the organisation's Disciplinary Procedure. Any complaints of discrimination will be dealt with through the organisation's Grievance Procedure.

Employees should report harassment or discrimination to their Line Manager as soon as possible after the incident or sequence of incidents. Employees who do not wish to approach their Manager or if their Manager is the alleged culprit, should approach a Director.

When an individual makes a complaint of discrimination, harassment the Manager or responsible person should:

- Discuss with the individual how to make a formal complaint, where appropriate
- Provide anyone who has been affected with support.
- Apply the disciplinary and/or grievance procedures, which may lead to dismissal for those responsible

It is the responsibility of every member of staff to ensure that they are working within this policy and keep up-to-date with changes in policy that may affect their practice of work.

Craig Finbow: Managing Director

Owls Hall Environmental Ltd.

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Signed:

A handwritten signature in blue ink, appearing to read 'C Finbow', is written over the 'Signed:' label.

Date: 03/01/2019

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