



Diversity & Equal Opportunities Policy

This document defines the policy on diversity and equal opportunities for Warm Dynamo Limited (the “Company”). It has the endorsement of the Board of Directors and will be regularly reviewed by the Board to ensure that it reflects any changes in applicable laws and developments in acceptable standards for the conduct of business. Our Company is committed to maintaining the highest ethical standards and vigorously enforces the integrity of its business practices wherever it operates.

1. Introduction

Equality of opportunity means that an individual’s diversity is viewed positively and in recognising that everyone is different, valuing equally the contribution that individual’s experience, knowledge and skills can make.

2. Policy Statement

The Company is committed to becoming a business, which is pro-diversity and anti-discriminatory. Where everyone’s diversity is valued and appreciated and in recognising that everyone is different, valuing the unique contribution that individual experience, knowledge and skills can make in delivering service goals.

This diversity should be visible at all levels of the business. The Company wants to develop services that are open, culturally aware and equally accessible to all sections of the community.

There are three main aims:

- To recruit, develop and retain a workforce that can deliver high quality services that are accessible, responsive and appropriate, that can meet the diverse needs of different customers within the areas which we operate;
- To ensure that the Company is a fair employer achieving equality of opportunity and outcomes in the workplace; and
- To ensure the Company uses its influence and resources as an employer to make a difference to the life opportunities of its local community especially those who are shut out or disadvantaged.

Everyone who works for the Company or applies for work must be treated fairly and valued equally. All recruitment processes, conditions of service, job requirements and learning and development opportunities, must fit with the needs of the service and those who work in it regardless of:

- Age;
- Disability;
- Race;
- Nationality;
- Ethnic or national origin;
- Gender;



- Religious beliefs;
- Sexual orientation;
- Domestic circumstances;
- Social and employment status;
- HIV status;
- Gender reassignment; and
- Political affiliation or trade union membership.

The Company will strive to provide an environment in which people want to work and to be a leader in good employment practice. This policy is about building on the current legal framework through the establishment of good practice and effective communication.

The Company is also committed to enabling each member of staff to achieve his or her full potential in an environment characterised by dignity and mutual respect.

3. General Principles

The Company will not tolerate the following:

- **Direct Discrimination** – occurs when treating an individual less favourably than you would treat anyone else in the same circumstances.
- **Indirect Discrimination** – occurs when a requirement or condition of employment has the effect of discriminating unfairly or unjustifiably between one individual and another. This can happen unintentionally.
- **Victimisation** – occurs if someone is given less favourable treatment than others, because they have exercised their rights under the policy or relevant legislation (e.g. by making a complaint or providing information on discrimination or has supported someone else who has made a complaint of discrimination).
- **Harassment or Bullying** – undermines people’s dignity and effectiveness at work. It may involve action, behaviour, comment or physical contact, which is unwanted, not reciprocated and which causes offence.

Any action or behaviour found to be in breach of this Policy may be regarded as misconduct or gross misconduct in accordance with the Company’s Disciplinary Procedure.

4. Our Responsibilities

As a Company

- The Managing Director is responsible for providing leadership to the Company in the promotion of equality and diversity. The Company Directors - collectively and individually - are responsible for supporting the Managing Director in this objective;
- The Company must conform to current legislative requirements;



- The Company seeks to ensure the quality of access and provision to services, and ensure, where carried out, installations meets the needs of our customers; and
- The Company seeks to dismantle the barriers that prevent equality of access to employment and promotion and development for all.

As Employees

- Co-operating with measures introduced by management to ensure equal opportunity and non-discrimination and that customers have equality of access to service provision;
- That they do not themselves discriminate e.g. any person responsible for selection decisions in recruitment, promotion, transfer, training or those responsible for the provision of services shall act in accordance with this and all other relevant policies;
- Not persuading, attempting to persuade or instructing other employees, or Management to practice unlawful or unreasonable discrimination;
- Not victimising or attempting to victimise individuals on the grounds that they have made complaints or provided information on discriminatory practice;
- Not harassing, bullying or intimidating other employees, including their peers, subordinates or seniors. This includes sexual or racial harassment; and
- Informing management, if they suspect or are aware, that discrimination of any kind is taking place.

As Managers

- Making clear to employees the Company's policy on equality and diversity and all supporting policies in relation to both employment and service delivery issues;
- Promoting equality and diversity by their behaviour and action;
- Ensuring that complaints under this policy are dealt with in a fair and consistent manner; and
- Ensuring that contractors and sub-contractors working for the Company, adhere to the principles of the Equality and Diversity Policy.

5. Recruitment and Selection

The overriding principle in relation to decisions concerning recruitment and selection is that they must be based on objective and job-related criteria, which should be applied fairly and consistently.

- **Attracting Candidates** – the Company aims to recruit employees on a fair and non-discriminatory basis. Job advertisements will not be confined unjustifiably to media that excludes or disproportionately reduces the number of applicants to a particular group. All advertisements will include a statement supporting the Company's commitment to equality of opportunity.
- **Recruitment** – the Company will not confine recruitment unjustifiably to those agencies, job centres, career offices and educational establishments that because of their methods source applicants only or mainly from one particular group. The Company will endeavour to ensure that these sources comply with good Equal Opportunities practices. The Company will not use



recruitment methods, which exclude or disproportionately reduce the number of applicants of a particular group, which cannot be shown to be justifiable.

- **Selection** - Employees involved in the recruitment and selection process will not treat applicants from particular groups less favourably than others. In addition, staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of selection criteria and the requirement to reach decisions based upon the requirements of the job role. The only criteria for those selected for interview are skill, experience and capability to undertake and perform the work required and to relate to the environment in which the vacancy exists. Those involved with the interview process will be given appropriate training and guidance on the recruitment and selection process. Selection criteria will be solely related to the requirements of the job.
- **Promotion, Training Opportunities and Transfer** – The Company will not restrict access to opportunities for promotion or training on the basis of colour, race, religion, gender, age, nationality, ethnic or national origin, sexuality, membership or non-membership of a trade union, marital status or disability. Priority will be given to opportunities directly related to your current position. Job and training opportunities will not exclude or disproportionately reduce the number of applicants from a particular group.
- **Dismissal (including Redundancy) and Other Detriment** – the Company will ensure that in the event of dismissal, redundancy, or any other detriment, employees will not be unfairly discriminated against on the basis of colour, race, religion, gender, age, nationality, ethnic or national origin, sexuality, membership or non-membership of a trade union, marital status or disability. The relevant Company procedures must be followed at all times.

6. Learning and Development

Every new employee will undergo a comprehensive induction programme including training in equality, diversity and human rights.

All employees will undergo training in equality and diversity appropriate to their job function.

The Company will provide training for staff, which will ensure compliance with the general and specific duties outlined in the Race Relations (Amendment) Act 2000 (RRA) (1995) 2000.

All employees should have individual Reviews and Development Plans that have been agreed and are reviewed regularly.

Information on training and development opportunities should be widely publicised and all employees will be encouraged to undertake training and development, which will enable them to progress within the Company.

The Company will not restrict access to opportunities for training or development and ensure that job and training opportunities will not exclude or disproportionately reduce the number of applicants from any particular groups. Priority will be given to opportunities directly related to your current position.



The Company will maintain a record of all employees who have received formal training and development in terms of the ethnic origin, gender, age and known disability.



7. Service Delivery and Customer Service

The Company will ensure that its services are non-discriminatory, enabling equality of access and provision and meet the requirements of the general and specific duties of the RRA and other relevant legislation. This will be enshrined within the Company's customer charter.

The Company will actively seek to ensure that the images it uses in its advertising, publicity material and web site is balanced to reflect the diversity of modern society.

The Company recognises that equal opportunities extend further than just employment, but also in the provision of services to all its customers. It aims to provide quality services, delivered in a non-discriminatory way by employees that are well-trained and courteous. It will encourage other organisations that provide services for it under contract to adopt the same approach.

No supplier of any goods, services or labour will be unlawfully discriminated against or treated less favourably than anyone else in the provision of goods, services or the supply of goods. Where required, the Company will provide documents and other materials in multiple languages.

The Company will ensure that all individuals, companies or organisations undertaking work, or providing goods or services, to or on behalf of the Company do not follow illegal discriminatory practices. Where they provide services on behalf of the Company they do so equally and without discrimination. The Company will seek to encourage any supplier or contractor to contribute to its policy by implementing fair practices in employment and training.

8. Monitoring and Review

The Quality Manager will have responsibility for monitoring the effectiveness of the Equality and Diversity policy in consultation with appropriate staff groups and external representatives.

An action plan will be implemented, and regular progress reports will be made to the Board.

The Quality Manager will ensure the policy is reviewed with respect to changes in legislation and/or at any time where it can be shown the needs of either the Company or its employees are not being met.

In order to demonstrate the fairness of recruitment procedures all applicants will be monitored as follows:

- All employees and job applicants will be required to complete the Equal Opportunities Monitoring Form;
- A record of applications received, those short listed for interview and job starters, in relation to their ethnic origin, gender, age, declared disability and grade will be maintained for all positions for a period of 6 months after the event; and
- Reasons for selection or non-selection for interview will be detailed on an applicant's register sheet. This will be kept for 6 months after the vacancy. This will require the selection criteria to be determined and retained.



Each person, who has overall responsibility for interviewing applicants and making the recruitment decision, will complete an applicant assessment form on which it should be made clear why the successful applicant has been offered employment. All comments whether the candidate has been successful or not should be as objective as possible and in accordance with the selection criteria. The information relating to all applicants whether selected for interview or not, will be retained for a period of 6 months then destroyed.

9. Positive Action

In specific circumstances, the Company will consider positive action measures as a way of overcoming inequality in accordance with relevant legislation.

The Company is committed to meeting the requirements of the Disability Discrimination Acts and it recognises the barriers that can be faced by disabled people and that disabled people have different needs relating to; age, gender, sexual orientation, culture and race. Clearly, disabled people can face greater barriers when they identify with any combination of these groups.

The Company will make reasonable adjustments to its business premises and working arrangements for its customers, job applicants, current disabled employees and employees who become disabled within the meaning of the legislation. Examples of such adjustments the Company has made include new access ramps, upgrading toilets when they are due for renovation, home working, training colleagues in sign language, asking applicants if they have any special requirements prior to interview and selection and amending the company web site. The Company will obtain advice where necessary from Occupational health specialists, the Disability Advisors in the Employment Service and Specialist advisors, on how it can support individuals and comply with the legislation.

Where employees are carers of disabled people including children please refer to the Company's flexible working policy.

When evaluating jobs, the Company will use a recognised system and an external independent consultant, to ensure fairness.

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No supplier of any goods, services or labour will be unlawfully discriminated against or treated less favourably than anyone else in the provision of goods, services or the supply of goods.

The Company will ensure that all individuals, companies or organisations undertaking work, or providing goods or services, to or on behalf of the Company do not follow illegal discriminatory practices. Where they provide services on behalf of the Company they do so equally and without discrimination. The Company will seek to encourage any supplier or contractor to contribute to its policy by implementing fair practices in employment and training.



10. Legislation

This Equal Opportunities Policy has been developed within the framework of existing legislation however, the primary legislation for this policy is the equality act 2010. If these legal requirements are contravened both the Company and the individual concerned will be rendered liable to legal proceedings. However, if the Company can prove that it has taken the necessary steps to prevent discrimination, only the individual would be considered liable for that unlawful act. This applies primarily to the Race Relations Act 1976 as amended by the Race Relations (Amendment) Act 2000 and The Race Relations Act (Amendment) Regulations 2003 and the Sex Discrimination Acts 1975 and 1986 and the Sex Discrimination Act 1975 (Amendment) Regulations 2003. It is essential that all employees bound by this policy are aware of their obligations under the law, as ignorance is not a defence.

Other Acts and legislative regulations that are also relevant to this policy are:

- Equal Pay Acts 1970 & 1983
- Equal Pay Act 1970 (Amendment) regulations 2003
- The Disability Discrimination Acts 1995 & 2005
- The Sex Discrimination (Gender Reassignment) Regulations 1999
- The Gender Recognition Act 2004
- The Employment Equality (sexual orientation) Regulations 2003
- The Employment Equality (Age) Regulations 2006
- Part Time Workers (Preventing less favourable treatment) Regulations 2000
- Employment Equality (Religion or Belief) Regulations 2003