



DIVERSITY POLICY





Managing Diversity and Equal Opportunities Policy

One Creative Environments Ltd. takes its responsibilities for managing diversity in all its business activities, and aims to contribute to environmental improvement and sustainable development.

An effective organisation is one which recognises and maximises the differences that exist between individuals whether they be age, sexual orientation, gender, race, colour, religion or beliefs, disability, marriage and civil partnership, gender re-assignment, sex or sexual orientation or pregnancy and maternity (Protected Characteristic).

The focus of equal opportunities is to ensure employers meet the requirements of employment and equal opportunities legislation. The focus for managing diversity is to enable organisations to nurture creativity and innovation, facilitating individuals to reach their potential. Managing diversity is therefore broader than equal opportunities. It enables the recognition and acceptance of individuals' differences in attitudes, values and experience in the workplace, including and respecting those differences.

General Principles

The principles which underpin this policy are as follows:

- to develop and implement fair and non-discriminatory systems for recruiting, developing and promoting people irrespective of age, disability, race, nationality, ethnic or national origin, gender, religion, beliefs, sexual orientation, domestic circumstances, marriage and civil partnership, social and employment status, HIV status, gender reassignment, pregnancy and maternity, trade union membership or political affiliation;
- to enable every employee to achieve his or her potential in an environment characterised by dignity and mutual respect;
- individual diversity is viewed positively and recognises that everyone is different, valuing equally the unique contribution that individual experience, knowledge and skills can make; and
- to build and develop a working environment which respects individuals' responsibilities and their wish to balance work and personal life.

The Directors and management of the Company are required to implement this policy and, in addition, employees at all levels have a responsibility to comply with the policy. It is the attitude and activities of everyone that will be responsible for ensuring that acts of discrimination, victimisation and harassment do not occur.

This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

Legislation

We have a legal responsibility in matters of equal opportunity. This policy complies with: the Equality Act 2010 and takes guidance from the Codes of Practice issued by the Equal Opportunity Commission, the Commission for Racial Equality and the Law Society. The Equality Act 2010 prohibits discrimination, harassment and victimisation in employment.



Roles and responsibilities

Board

- Ensure that equality and diversity are integrated into the business of the company;
- Ensure that board members are appropriately trained to manage equality and diversity;
- Ensure that the company applies the principles of managing diversity to all its operations and demonstrates a commitment to managing diversity;
- Ensure that this commitment is communicated to all employees;
- Lead by example, developing and promoting an organisational culture that is supportive of the benefits of managing diversity;
- Ensure all HR policies, practices and procedures are consistent with legislative requirements and best practice;
- Ensure that employees have access to training to support the principles within this policy;
- Monitor the effectiveness of the policy and take any necessary remedial action; and
- Report to the board any incidents relating to this policy.

Managers

- Ensure that policies and procedures relating to managing diversity are implemented and communicated to all existing employees and new employees on their commencement;
- Promote a professional and positive work environment, also ensuring employees' rights;
- Raise awareness of managing diversity and the principles of equality of opportunity, acting as a role model for others and developing personal skills to handle issues relating to discrimination and harassment; and
- Be directly responsible for the resolution of issues relating to harassment and discrimination in their work are in accordance with this policy and including the disciplinary policy where necessary.

Discrimination

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts, and on work-related trips or events including social events).

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.



- **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Recruitment and selection

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person and with the involvement of the Human Resources Department, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

We take steps to ensure that our vacancies are advertised to a diverse labour market [and, where relevant, to particular groups that have been identified as disadvantaged or under-represented in our organisation].

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the Human Resources Department. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from UK Visas and Immigration.

To ensure that this policy is operating effectively, and to identify groups that may be under-represented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.



Complaints

If anyone feels that he or she has been treated unfairly or discriminated against, then this should be dealt with under the grievance procedure which is outlined in a separate policy. Use of the grievance policy does not take away any individual rights under law.

Training

We will provide training and general updates where appropriate with regard to Equal Opportunities, including harassment, to all employees.

Review and Update

This policy will be reviewed by the Board and where appropriate updated annually. In conclusion, you are encouraged to support the company in complying with the policy and the cultural working environment expected within. You are urged to report any breach of this policy and/or any concerns to the Managing Director. Any breaches of this policy will be dealt with under the disciplinary policy.

Part-time and fixed-term work

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or through our Anti-harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.