



# Equality & Diversity Policy

*Equality and Diversity is the ability to be different*

## POLICY STATEMENT

EC is committed towards the wellbeing of employees by providing and maintaining an inclusive and productive work environment, which promotes equality, diversity, mutual respect, integrity and professional conduct. The aim is that our workforce is truly representative of all sections of society and each employee feels respected and able to give their best.

All employees, whether full-time, part-time or temporary, are to be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be based on aptitude and ability. All employees will be supported and encouraged to develop their full potential.

No employee, job applicant, customer or client is to receive less favourable treatment (either directly or indirectly) on grounds of age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy or maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex, or sexual orientation (the protected characteristics).

EC is opposed to all forms of unlawful and unfair discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

This policy operates in accordance with statutory requirements.

## OUR COMMITMENT

- To encourage equality and diversity in the workplace
- To create a working environment free of bullying, harassment, intimidation, victimisation and unlawful discrimination and that promotes dignity and respect for all, where individual differences and the contributions of all staff are recognised and valued.
- To regularly review employment practices and procedures to ensure fairness, and update them and the policy to account for changes in the law.
- To ensure training, development and progression opportunities are available to all staff.
- To train managers and all other employees about their rights and responsibilities under the 'Equality and Diversity Policy'.
- Breaches of our Equality and Diversity Policy will be regarded as misconduct under EC's **Disciplinary and Grievance Policy and Procedure** and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and may lead to immediate dismissal.



## RESPONSIBILITIES OF MANAGEMENT

Responsibility for ensuring the effective implementation and monitoring of the 'Equality and Diversity Policy' will rest with the Global Talent Director and the Talent Team.

Managers will ensure that they and their staff operate within the policy, and that all reasonable and practical steps are taken to avoid unlawful discrimination and victimisation. Managers will ensure that:

- All staff are aware of the policy and its purpose;
- All staff complete Equality and Diversity/ Harassment and Discrimination training;
- Grievances concerning discrimination and harassment are dealt with properly, fairly and as quickly as possible;
- Proper records are maintained.

## RESPONSIBILITIES OF STAFF

All staff should understand that during their employment, they, as well as EC, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination against fellow employees, customers, clients and suppliers.

All staff will ensure that they:

- Comply with the Equality and Diversity Policy;
- Do not unlawfully discriminate in their day to day activities or induce others to do so;
- Do not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics;
- Ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic;
- Inform their manager if they become aware of any discriminatory practice.

## THIRD PARTIES

Third-party harassment occurs when an EC employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. EC will not tolerate such actions against its staff, and the employee concerned should inform their manager as soon as this has occurred. EC will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

## WHEN DOES THE POLICY APPLY?

This policy applies to all conduct in the workplace and outside the workplace in a work-related context (e.g. at meetings, social events or business trips) or which may impact on EC's reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to EC).



## RECRUITMENT AND SELECTION

Our recruitment and selection procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities:

- A carefully worded and objective job description is produced for all vacancies, outlining essential skills, knowledge and experience required.
- All vacancies are advertised on EC's Career site and/or on Yammer.
- Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.
- Job advertisements avoid stereotyping or using wording that may discourage groups with a protected characteristic from applying.
- Shortlisting and interviewing of applicants is done by suitably trained staff and wherever possible, done by more than one person to ensure no discrimination between job applicants.
- Applicants are not asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the Talent Team's approval, for example questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).

## TRAINING, DEVELOPMENT AND PROMOTION

EC will ensure that irrespective of any personal characteristics:

- All employees are encouraged to achieve their full potential;
- Selection for all training, career development opportunities, promotions and job moves will be purely based on merit;
- All employees will undergo mandatory equality and diversity training, either face to face or through EC's online Learning and Development platform, Ignite;
- Appraisals of performance will be conducted objectively and in a timely manner. Appraisals provide a structured opportunity to discuss development needs. It is the responsibility of managers to ensure that all staff have appropriate training and development opportunities.

## MEETING INDIVIDUAL NEEDS

As far as possible EC will try to meet the needs of individual employees at work. EC has policies and procedures in place to help employees balance work and family life and/or enhance their career development – see **EC's Sabbatical Policy** and **Flexible Working Policy** (found in the employee handbook).

EC is also committed to promoting equal opportunities, employability and retention of people with disabilities. Under the terms of this policy, managers are required to:

- Make reasonable adjustment to retain an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours (after having sought advice and guidance from external agencies);
- Include employees with a disability in training and development and progression opportunities;



- Give full and proper consideration to people with a disability who apply for a vacancy at EC, having regard to making reasonable adjustments for their aptitudes and abilities to allow them to be able to do the job.

## EQUAL PAY

EC is committed to the principle of equal pay for like work, work of equal value and work rated as equivalent for all its employees and understands that equal pay between men and women is a legal right.

## HARASSMENT AND BULLYING

Wellbeing at the workplace is equally important to both EC and employees alike, and everyone is responsible for sustaining an inclusive work environment and ensuring wellbeing at the workplace.

Harassment and bullying are actions which disrupt equality and wellbeing at the workplace. These actions are known to have serious consequences for employers, as well as employees. They can negatively affect people's health, work performance and overall success. In this light, harassment and bullying will be regarded as a workplace health and safety matter, and therefore, will be treated seriously and responsibly.

**Harassment** may be defined as any conduct which is:

- Unwanted by the recipient;
- Is considered objectionable;
- Causes humiliation, offence, distress or other detrimental effect.

Harassment may be an isolated occurrence or repetitive; it may occur against one or more individuals. Harassment may be, but is not limited to:

- Physical – ranging from touching to serious assault, gestures, intimidation, aggressive behaviour.
- Verbal – unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter, shouting or swearing.
- Non-verbal – offensive literature or pictures, graffiti and computer imagery, isolation or non-co-operation and exclusion or isolation from social activities.

**Bullying** is unlikely to be a single or isolated instance. It is usually, but not exclusively, repeated and persistent behaviour which is offensive, abusive, intimidating, malicious or insulting. Bullying includes but is not limited to:

- Conduct which is intimidating, physically abusive or threatening;
- Conduct that denigrates, ridicules or humiliates an individual, especially in front of colleagues;
- Humiliating an individual in front of colleagues;
- Picking on one person when there is a common problem;
- Shouting at an individual to get things done;
- Consistently undermining someone and their ability to do the job;



- Setting unrealistic targets or excessive workloads;
- “Cyber bullying” i.e. bullying via e-mail or social media.

**Harassment and bullying may be summarised as any behaviour that is unwanted by the person to whom it is directed. It is the impact of the behaviour rather than the intent of the perpetrator that is the determinant as to whether harassment or bullying has occurred.**

## **GRIEVANCES/DISCIPLINE**

Employees have a right to pursue a complaint concerning any breach of EC’s Equality and Diversity Policy via **EC’s Grievance Procedures** found in the employee handbook. Employees, who believe they are experiencing any form of discrimination, victimisation, harassment or bullying are advised to note and record each incident and report it to their manager or a member of the Talent team as soon as possible.

Discrimination, victimisation, harassment and bullying will be regarded as offences which carry disciplinary and/or criminal proceedings. **EC’s Disciplinary Procedure** is found in the employee handbook.

These are sensitive issues. Confidentiality will be maintained as far as possible, to respect the privacy of all those concerned and to ensure that any matters are dealt with sensitively and effectively. Any breach of confidentiality may result in disciplinary action against those concerned. However, it will be necessary that any alleged perpetrator is made aware of the allegations against them and the name(s) of those making the allegations together with the name(s) of any witnesses.

## **REVIEW**

The effectiveness of this policy will be reviewed on an ongoing basis under the direct supervision of the Global Talent Director. This policy does not form part of any employee's contract of employment and it may be amended at any time.

## **BREACHES OF THIS POLICY AND RELEVANT REGIONAL LAW:**

**Any reported breaches will be investigated through the relevant procedures found in the Employee Handbook (regional handbooks apply) and may result in disciplinary action being taken. Staff who have concerns about unlawful discrimination, harassment or bullying are advised to contact their line manager or a member of the Talent Team.**