

## INTRODUCTION

The purpose of this statement is to make clear the Company's commitment to the principle of Equal Opportunities and to outline the way in which the Company will implement its policy.

The policy will be available for inspection at the Company's Head Office at all times during business hours and a copy will be supplied to all employees and additional copies will be supplied whenever they are requested.

Overall responsibility of the implementation and monitoring of this policy has been allocated to:

Mr M J Finlay                      Director

Mr Clive Cole                      Director

## COVERING THE FOLLOWING LEGISLATION:

- The Equality Act which (replaces most of the following)
- Race Regulations (Amendment) Act
- Sex Discrimination Act and as amended by Equality Act
- Equal Pay Act
- Disability Discrimination Act
- Human Rights Act
- Employment Equality (Religion or Belief) Regulations
- Employment Equality (Sexual Orientation) Regulations
- Employment Equality (Age)

## THE AIMS AND OBJECTIVES OF THIS POLICY

The Equality Act, The Race Relations (Amendment) Act, Sex Discrimination Act, Equal Pay Act, Disability Discrimination Act, Human Rights Act and Employment Regulations for Religious Belief and Sexual Orientation apply to all employees and therefore all Company employees are bound by these Acts when carrying out duties for and on behalf of the Company. The Acts makes it unlawful for the Company to discriminate against any employee or prospective employee on the grounds of colour, race, nationality, religion, or ethnic or national origins; gender or sexual orientation; age or disability.

## HOW THE POLICY WILL WORK

The policy covers all job applicants and all existing employees and is aimed in particular at those groups of people who have particular difficulty in attaining employment or promotion, i.e. ethnic minorities, women and disabled people.

## CULTURAL AND RELIGIOUS NEEDS

Where appropriate the Company considers and tries to adapt to meet the cultural and religious needs of its employees where practically possible.

## COMMUNICATION

Where the workforce includes those whose English is limited, every step is made to ensure that communications is as effective as possible.

We use language line as a way of communicating information via telephone in the required language.

Display clear signage in relative languages on site.

Ensure the language selection on mobile phones is selected for persons who first language is not English.

## REGISTERED DISABLED

The Company has a legal responsibility to employ a number of registered disabled people equal to 3% of its workforce.

## INSTRUCTIONS AND PRESSURE TO DISCRIMINATE

It is unlawful to instruct or force others to discriminate on racial grounds and any employee found guilty of doing so will be treated as having committed a disciplinary offence.

## VICTIMISATION

Any employee being found guilty of victimising another on the grounds of race, creed or colour will be treated as having committed a disciplinary offence.

## CODE OF CONDUCT

All persons employed by this Company must follow a Code of Conduct, set out by this Company, as part of their Contract of Employment. Any persons not carrying out the Code will be treated as having committed a disciplinary offence.

## RECRUITMENT

We try to ensure that advertisements for job vacancies are made in places likely to reach all racial groups, i.e. the local Job Centre, the local papers, the schools and careers office, and the main London evening paper.

We do not use recruitment methods which exclude or disproportionately reduce the number of applicants from a particular racial or sexual group.

In recruitment advertising it is the Company's policy to make people aware that we are an Equal Opportunities Employer by references on job advertisements. Applicants are free to see copies of the Company's policy on Equal Opportunities before or during interview.

## SELECTION AND CRITERIA OF TESTS

Criteria and tests are related to the job requirements and are not unlawfully discriminatory.

## TREATMENT OF APPLICANTS

All staff on meeting casual or formal applicants, i.e. those working at security, reception or personnel should not treat any racial groups less favourably than others. A proper selection criteria is consistently applied, and short and second interviews are carried out at senior management level.

## TRANSFERS AND TRAINING

General arrangements on job transfers and promotions should not be of a discriminatory nature and are examined carefully to ensure this.

## DISMISSAL AND OTHER DETRIMENT

Selection for dismissal and redundancy is not made on discriminatory grounds and in the event of dismissal, consultation at senior management level must be carried out.

## WOMEN

This Company has taken and will continue to take positive steps to enable women to take advantage of increased career opportunities. This Company encourages women to return to work after maternity leave.

## IMPLEMENTATION

Two of the longest serving Directors of the Company, Clive Cole and Michael Finlay, who is our Managing Director, have joint responsibility for the implementation of our policies and ensure these are cascaded down to our employees.

They are responsible for ensuring recruitment procedures adhere to our policy on Equal Opportunities and of any new legislation surrounding equality and diversity.

All employees are bound by the Acts listed above and must adhere to them when carrying out their duties for or on behalf of Ark.

Ark is based in a Borough with a rich ethnic background. We make every effort to ensure equality of opportunity for all in terms of recruitment and have adopted a targeted campaign for recruiting minorities. This should include advertisements in:

- Local press
- Minority press
- Local job centres
- Schools
- Career Offices

In all our advertisements we state that we are an equal opportunities employer.

All employees are given a copy of our Equal Opportunities Policy to read, as well as our Company Handbook which outlines our Policy, and all applicants can view our Policy on request at interview stage. All employees must be aware of any changes or adaptations to our Policy by the use of e-mails, memos, Equality Workshops and notice boards.

All employees are, therefore, expected to be able to comply with our Policy and the relevant Equal Opportunities legislation. Any employee reported to be in breach of the regulations, that is to say anyone who has discriminated against, or has bullied, threatened or harassed any other member of staff or client on the basis of race, creed, gender, sexual orientation, religion, age or disability, will be dealt with appropriately following an investigation by us to determine the facts.

We are proactive with regards to our recruitment of persons with disability.

Where deemed appropriate, we should make special allowances for ethnic minorities, women or disabled persons and offer extra training should it be required. We make every effort to ensure that, as a company, we meet the cultural and religious needs where practically possible, e.g. honouring paid holidays for religious festivals.

Our commitment to both the Equal Pay Act 1970 and Sex Discrimination Act 1975 is evident, and many women occupy positions of authority, earning the equivalent pay as the men occupying similar positions. Under no circumstances should an employee receive unequal terms of employment on the grounds of gender.

We do not prompt any employee or prospective employee to disclose their sexual orientation, and do not treat any individual less favourably than others on the grounds of sexual orientation.

Ark has a commitment to employing its staff from various ethnic groups, valuing highly their significant contribution to its success. All employees are made clear of what is expected of them as members of the Ark team in the Disciplinary Rules and Procedures, available to all employees in the Employee Handbook.

### MONITORING AND REVIEW

Ark monitors our Equal Opportunities Policy on a regular basis to ensure its compliance with Governmental legislation and to our own commitment to equality in employment and service provision.

Monitoring of applicants will be carried out on an annual basis to assess how different minority groups are being placed by grade and section. If it becomes apparent that particular groups are being overlooked through the current recruitment policies then a more directional system will be put in place, in order to avoid these situations accruing, i.e. targeting advertising through community base and specific media etc.

Monitoring of suppliers and sub-contractors will be carried out on a regular basis to confirm that they comply with all aspects mentioned in our Equalities Policy. Any supplier or sub-contractor found to be in breach of our policy, or of Governmental regulation with regard to Equality, shall be removed from our supply chain.

We will, further, endeavour to monitor our activities with regard to service provision to ensure that, to the best possible way, we are offering the same quality and opportunity of service to all our clients and end users.

Management and Quality Control personnel will make sure that we offer equal service to all parties, regardless of race, gender, age, disability etc.

All employees are to observe our Code of Conduct when dealing with culturally diverse communities, which forbids them to behave inappropriately or make discriminatory comments to our customers, on the grounds of race, gender, religion, culture, age, disability or and sexual orientation.

#### **APPROACH TO SETTING PRIORITIES AND TARGETS**

Following an annual review of our Policy and its effectiveness, in which the Management Team will assess whether our recruitment and training practices with regards to providing equality of opportunity are working in practice, the Directors responsible for the Policy shall develop an action plan for the forthcoming year to ensure that our workforce monitoring and training targets are met.

Areas of concern will be highlighted in the annual review and the purpose of the action plan is to form a strategy to rectify the non-compliance with our policy, or with current legislation. Examples of strategies to pursue are:

- Increased training on our Equal Opportunities Policy to staff dealing with recruitment, training and promotion
- Increased expenditure on targeted recruitment advertising for minority groups
- Electing an “Equalities Champion” within each department to ensure that no member of staff is subject to bullying, harassment or discrimination on the grounds of their ethnicity, belief, religion, culture etc,
- Incorporating Equality and Diversity training in initial site induction issued to employees on commencement of a project

#### **COMMUNICATION OF POLICY TO STAFF**

All staff are made aware of and issued a copy of our Equal Opportunities Policy on commencement of employment, and can be issued a copy on request at interview stage. Our Equal Opportunities Policy is also set out in our Employees Handbook, and in recruitment advertisements.

Any amendments, additions and/or adaptations are communicated to staff via notices placed on the notice board, memos and use of e-mails. Significant changes in policy will result in additional training given to staff, with copies of the updated Policy issued.

### **PROTECTION OF STAFF FROM DISCRIMINATION**

If any member of staff feels he/she has been discriminated against he/she must report it in writing to either Clive Cole or Michael Finlay. A full investigation will occur to determine the provocation and appropriate disciplinary measures will occur, which could result in suspension for the person(s) acting in a discriminatory manner.

All our policies regarding recruitment, training and promotion take into account our Equal Opportunities Policy and existing employment legislation.

### **TRAINING**

Ark is totally committed to equality and diversity, and appreciate the importance of conveying our policies on equal opportunities and diversity to our workforce.

We provide our staff and operatives with workshops every 3 months in view of our Equal Opportunities Policy and current legislation. The aims and objectives of these workshops are:

- To familiarise employees with some important equal opportunity rights and responsibilities as covered by the law.
- To ensure that all employees are aware of their rights given to them by law and how they protect their rights to be part of the community and the team, and not to be unfairly discriminated.
- To inform them of their responsibilities under law and emphasise that, while they have the right to be treated fairly, they also have the responsibility not to discriminate against others and to treat others with respect and fairness.
- Any other pertinent issues that arise as required

The workshops are divided into recurring themes and should give the participants the opportunity of a question and answer session. The themes covered should be as followed:

- Orientation: Purpose of the workshops; understanding the benefits of diversity; explaining individual rights, responsibilities and the grievance complaint procedures.
- Law and Acts: Equal opportunities regulations – an overview of important legislation, such as the Race Relations Act 1976, Equal Pay Act 1970, Sex Discrimination Act 1975, Disability Discrimination Act 1995, The Human Rights Act 1998.
- Ark's Equal Opportunities Statement: An overview of the Statement; how it is integrated into the Company workplace; how it creates a positive work environment.
- Basic Human Awareness: Elements of unlawful discrimination and the ways in which it may be manifested in the society; how stereotypes may lead to prejudice; how prejudice, when combined with power may lead to discrimination; strategies to prevent discrimination.
- Communication: Process and barriers to communication; improving communication skills, giving a receiving feedback; describing effective listening.

Workshops are continued every year to expand upon the topics as outlined above, emphasising the importance of each individual's responsibility not to discriminate unfairly and to report it if they are either

- Subject to discrimination, bullying or harassment on the grounds of race, gender, age, disability, sexual orientation, religion, culture, or
- Witness to a person being discriminated against, bullied or harassed, on the grounds of race, gender age, disability, sexual orientation, religion, culture.

We provide additional training for our Management Staff in the form of 4 workshops annually - every 4 months, to take into account:

- Our Staff Recruitment, Training and Staff Development Policies and how they link with our Equal Opportunities Statement.
- Anti-Bullying and Harassment Policy and their responsibilities, as Management, to act upon complaints of bullying, harassment and discrimination, ensuring the appropriate measures are taken.
- Their role, as key members of Ark, to implement our Policies in all levels of operation and service delivery.

All our operatives will receive inductions on Customer Care before commencement of their work on-site, whereby our Code of Conduct will be emphasised, covering the compartment of operatives to residents and/or other building users. The inductions will also discuss communication with persons whose first language is not English, and the methods to carry out effective interaction.

All office-based staff will receive periodic seminars covering the same.

**For and on behalf of Ark Build Plc**



**Michael Finlay**

**Managing Director**

**01.03.2018**