



SECTION 1 THE EQUALITY AND DIVERSITY POLICY STATEMENT

- 1.1 Merebrook Consulting Limited ("the Employer") is an equality and diversity Employer and is committed to a policy of treating all its Employees and job applicants equally.
- 1.2 The person who shall be responsible for ensuring compliance with this equality and diversity policy shall be the Company Secretary.
- 1.3 All Employees shall be made aware of this policy by its inclusion in the individual employment contracts and by its vigorous enforcement.
- 1.4 The policy can also be found on the Employers:
 - i.* Intranet,
 - ii.* Website,
 - iii.* Staff notice boards,
 - iv.* Staff manual
- 1.5 The Equality and Diversity Policy is reviewed regularly. Any and all amendments to the policy will be brought to the attention of all Employees by the measures mentioned above.
- 1.6 Merebrook Consulting Limited are committed to eliminating unlawful discrimination and to promoting equality and diversity within our policies, practices and procedures. We are also committed to promoting equality and diversity within Merebrook. This applies to our professional dealings with clients, Employees and third parties. We shall treat everyone equally and with the same attention, courtesy and respect regardless of the following protected characteristics as stated in the Equality Act 2010:
 - i.* Age
 - ii.* Disability
 - iii.* Gender Reassignment
 - iv.* Marriage and Civil Partnership
 - v.* Pregnancy and Maternity
 - vi.* Race
 - vii.* Religion or Belief
 - viii.* Sex
 - ix.* Sexual Orientation



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- 1.7 It is the policy of the Employer to take all reasonable steps to employ and promote Employees on the basis of their abilities and qualifications without regard to any protected characteristic.
- 1.8 The Employer will appoint, train, develop and promote on the basis of merit alone.
- 1.9 Employees have a duty to co-operate with the Employer to ensure that this policy is effective to ensure equality and to prevent unlawful discrimination. Disciplinary action will be taken against any Employee who is found to have committed an act of improper unlawful discrimination. Serious breaches of the equality policy will be treated as gross misconduct.
- 1.10 Employees must not harass or intimidate other Employees on the grounds of any protected characteristic. Such behaviour will be treated as gross misconduct in accordance with the disciplinary procedure.
- 1.11 Types of unlawful discrimination, harassment and victimisation can be classed as follows:
- i.* Direct discrimination - Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.
 - ii.* Discrimination by association - Applies to race, religion or belief and sexual orientation, age, disability, gender reassignment and sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
 - iii.* Perception discrimination - Applies to age, race, religion or belief and sexual orientation, disability, gender reassignment and sex. This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.
 - iv.* Indirect discrimination - Applies to age, race, religion or belief, sex, sexual orientation and marriage and civil partnership, disability and gender reassignment. Indirect discrimination can occur when you have a condition, rule, policy or even a practice within Merebrook that applies to everyone but particularly disadvantages people who share a protected characteristic.
 - v.* Harassment - Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees are also protected from harassment because of perception and association.



- vi.* Third party harassment - Applies to sex, age, disability, gender reassignment, race, religion or belief and sexual orientation. Third party harassment is harassment by third parties who are not Employees of the Company, such as customers or clients.
- vii.* Victimisation - Victimisation occurs when an Employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act 2010; or because they are suspected of doing so. An Employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.
- viii.* A disabled person may be discriminated against if they receive unfavourable treatment arising from their disability.

- 1.12 Employees should draw the attention of their line manager to suspected discriminatory acts or practices.
- 1.13 Employees must not victimise or retaliate against an Employee who has made allegations or complaints of any protected characteristic or provided information about such discrimination. Such behaviour will be treated as gross misconduct in accordance with the disciplinary procedure.
- 1.14 Employees should support colleagues who suffer such treatment and are making a complaint.

SECTION 2 EQUALITY PROCEDURE

- 2.1 Sources of Recruitment
 - 2.1.1 The recruitment process must result in the selection of the most suitable person for the job in respect of experience and qualifications.
- 2.2 Reasonable Adjustments
 - 2.2.1 In addition, to make sure that disabled people have the same access, as far as is reasonable, to everything that is involved in getting and doing a job as a non-disabled person, Merebrook must make reasonable adjustments.
 - 2.2.2 If an applicant asks for information about the job and the application form (if there is one) in an alternative format which they require because they are a disabled person then we must provide this, so long as it is a reasonable adjustment (and it is likely to be).
 - 2.2.3 If an applicant needs reasonable adjustments to participate in any interview or assessment process, then we will make them.
 - 2.2.4 When assessing an applicant's suitability for the job, account will be taken of how reasonable adjustments could enable them to do the job.



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- 2.2.5 If, after taking reasonable adjustments into account, they would not be the best person for the job, we do not have to offer it to them.
- 2.2.6 However, if they would be the best person with the reasonable adjustments in place, we will offer them the job.
- 2.3 Advertisements
- 2.3.1 Recruitment publicity must positively encourage applications from all suitably qualified and experienced people.
- 2.3.2 Unlawful discrimination will be avoided at all times.
- 2.3.3 When advertising job vacancies, in order to attract applications from all sections of the community, the Employer will, as far as reasonably practicable:
- i.* Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants of a particular protected characteristic;
 - ii.* Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular protected characteristic;
 - iii.* Where vacancies may be filled by promotion or transfer, they will be published to all eligible Employees in such a way that they do not restrict applications from Employees of any particular protected characteristic;
 - iv.* The Employer will not recruit new Employees solely on the recommendation of an existing Employee.
- 2.4 Selection Methods
- 2.4.1 The selection process will be carried out consistently for all jobs at all levels. The Employer will ensure that this Equality and Diversity Policy is available to all Employees and in particular is given to all Employees with responsibility for recruitment, selection and promotion.
- 2.4.2 The selection of new Employees will be based on the job requirements and the individual's skills, qualities, experience to do, or to train for the job in question.
- 2.5 Selection Tests
- 2.5.1 Selection tests that are used will be limited to questions relating to the particular job and/or career requirements. The tests will measure the individual's actual skills, qualities, experience to train for the work or career. Thus, questions or exercises on matters which may be unfamiliar to applicants of a particular protected characteristic will not be included in the tests if they are unrelated to the requirements of the particular job.



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- 2.5.2 The tests that are used will be monitored and reviewed annually in order to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism.
- 2.6 Applications and Interviewing
- 2.6.1 All applications will be processed in the same way.
- 2.6.2 We will always be flexible and make changes to the dates or times of interviews to avoid unlawful discrimination.
- 2.6.3 Subject to clause 2.7.1 below, we will only ask questions about whether the applicant has the relevant skills, qualities and experience to do the job, not about their health or about any disability they may have.
- 2.6.4 The Employees responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria, and of the need for their consistent application.
- 2.6.5 Wherever possible, all applicants will be interviewed by at least two people.
- 2.6.6 All questions that are put to the applicants will relate to the requirements of the job.
- 2.7 Questions about Health or Disability
- 2.7.1 Except in very restricted circumstances or for very restricted purposes, we will not ask any job applicant about their health or any disability until the person has been:
- i.* offered a job either outright or subject to references, including number of sick days taken or
 - ii.* included in a pool of successful candidates to be offered a job when a position becomes available.
- 2.7.2 This includes asking such a question as part of the application process or during an interview. Questions relating to previous sickness absence count as questions that relate to health or disability.
- 2.7.3 We may ask questions once a job offer has been made or included someone in a group of successful candidates. At that stage, we could make sure that someone's health or disability would not prevent them from doing the job, however, we must consider whether there are reasonable adjustments that would enable them to do the job.
- 2.8 Promotion, Transfer and Training
- 2.8.1 The Employer will take such measures as may be necessary to ensure the appropriate training, supervision and instruction for all line managers in order to familiarise them with the Employer's policy on equality and diversity, and in order to



help them identify discriminatory acts or practices and to ensure that they promote equality within the departments for which they are responsible.

- 2.8.2 All persons responsible for selecting new Employees, Employees for training, whether induction or promotion training, or for transfer to other jobs, will be instructed not to unlawfully discriminate on the grounds of the Employee's protected characteristic.
- 2.8.3 Where a promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory.
- 2.8.4 The promotional system will be monitored and reviewed annually in order to assess how it is working in practice.
- 2.8.5 When a group of workers predominantly of one protected characteristic is excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure that there is no unlawful discrimination.
- 2.9 Terms of employment, benefits, facilities and services
 - 2.9.1 All terms of employment, benefits, facilities and service will be monitored and reviewed annually in order to ensure that there is no unlawful discrimination on the grounds of any protected characteristic.
- 2.10 Grievance, disputes and disciplinary procedures
 - 2.10.1 All allegations of unlawful discrimination on the grounds of any protected characteristic will be dealt with seriously, confidentially and speedily.
 - 2.10.2 The Employer will not ignore or treat lightly grievances or complaints from members of a particular protected characteristic on the assumption that they are over sensitive about discrimination.
- 2.11 Monitoring equality
 - 2.11.1 The Employer will monitor and review annually the effects of selection decisions and personnel practices and procedures in order to assess whether equality is being achieved.
 - 2.11.2 The Employer will monitor and review annually:
 - i.* The composition of the work force of each department and changes in distribution over periods of time, with regard to each protected characteristic.
 - ii.* The selection decisions for recruitment, promotion, transfer and training, according to the protected characteristics, and the reasons for those decisions.



- iii.* The Employer will monitor and review annually the selection criteria and personnel procedures to ensure that they do not include requirements or conditions which constitute, or may lead to, unlawful indirect discrimination.

SECTION 3 EQUALITY OF TREATMENT IN EXTERNAL RELATIONS

- 3.1 External relations
- 3.1.1 Merebrook Consulting Limited interacts with external bodies in a number of ways including in the provision of services, public relations, charitable donations, pro-bono work and recreational events.
- 3.1.2 In all external relations Merebrook will take active steps to ensure that it does not unlawfully discriminate any protected characteristic.
- 3.2 Client relations
- 3.2.1 Merebrook will seek to ensure that it offers its service and accepts appointments from third parties based upon commercial considerations. Those commercial considerations will include ability to offer the service, acceptability of the financial status of the external party and compatibility of the work and client profile with the current portfolio. No decision to offer, not offer, accept or not accept appointments will be made based upon the make up or likely make up of the client's personnel in respect of any protected characteristic.
- 3.2.2 Where Merebrook is working for or with external clients who appear to be discriminating on these grounds or who allow their Employees to do so, Merebrook will arrange for appropriate level discussion with the senior management of the client to discuss the apparent unlawful discrimination and in the first instance seek to ensure that the discriminatory behaviour is eliminated. Where no satisfactory agreement can be achieved Merebrook will act to cancel or suspend work with that client as soon as contractually possible.
- 3.3 Public Relations, charitable donations etc
- 3.3.1 Merebrook will seek to ensure in all its relations with external bodies including charitable donations and recreational events, that the parties it engages with, supports, sponsors or benefits are not likely to follow policies of unlawful discrimination. For the avoidance of doubt, the foregoing shall not in any way prevent Merebrook or its Employees from contributing to reputable and registered charities which are intended to support persons of specific status and need including those with disabilities, those in specific geographic locations or those persons of younger or older age.
- 3.3.2 When any reasonable complaint is raised concerning the status of third parties, Merebrook will actively take steps to ensure that its policy is being followed.