



Policy: Diversity Policy

Owner: HR

Effective date:

Revised: May 2019

Review due: May 2020

Policy: Diversity Policy

Owner: HR

Effective date: May 2019

Revised:

Review due: May 2020

1 Purpose of Policy

1.1 Crown Agents believes that a significant part of its success is based upon maintaining and developing an environment where its employees are recognised as individuals and provided with opportunities to realise their full potential, regardless of their age, disability, gender reassignment, race, religion or belief, sex, health, social class, sexual orientation, marriage and civil partnership, pregnancy/maternity status, or trade union membership

1.2 Crown Agents is an equal opportunities employer and is committed to a policy of treating all its employees and job applicants on an equal basis. Crown Agents will recruit, train, and promote in all job areas without discriminating against any employee or job applicant on grounds of their age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status, as defined below:

2 Protected Characteristics

These are:

- Age – people of all ages are protected.
- Disability – a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, eg. using a telephone, reading a book, using public transport.
- Gender Reassignment – a transsexual person is someone who proposes to, starts or has completed a process to change his or her gender. However, they do not need to be under medical supervision.
- Marriage and Civil Partnership – people who are married or in a civil partnership are protected.
- Pregnancy and Maternity – a woman is protected against discrimination on the grounds of pregnancy and maternity during the period of pregnancy and any statutory maternity leave to which she is entitled.
- Race – this includes colour, nationality and ethnic or national origins.
- Religion or belief – includes any religion or lack of religion. A religion must have a clear structure and belief system. Belief means any religious or philosophical belief or lack of belief. Humanism is a protected philosophical belief, but political beliefs are not covered.
- Religion or belief – includes any religion or lack of religion. A religion must have a clear structure and belief system. Belief means any religious or philosophical belief or lack of belief. Humanism is a protected philosophical belief, but political beliefs are not covered.
- Sex – Men and women are protected.
- Sexual Orientation – Bisexual, gay, heterosexual and lesbian people are protected.

Policy: Diversity Policy

Owner: HR

Effective date: May 2019

Revised:

Review due: May 2020

3 Responsibility

- 3.1 The Human Resources Director shall have prime responsibility for implementing and monitoring this policy. Any queries on diversity issues should be referred to the Human Resources Director. The Human Resources Director should also ensure all staff involved in managing and administering the recruitment and selection process are aware of the contents of this policy.
- 3.2 All employees are personally responsible for applying this policy and for not discriminating against any other member of staff or potential member of staff.
- 3.3 Managers are also responsible for ensuring that neither they, nor employees reporting to them, discriminate against existing or prospective employees on any of the discriminatory grounds indicated above.

4 What is discrimination?

- 4.1 To assist employees in ensuring that any type of discrimination is avoided, below is an outline of its main forms:
- 4.2 **Direct Discrimination** – this may occur where a person is treated less favourably than another on grounds of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status.
- 4.3 **Associative Discrimination** – this may occur where a person is treated less favourably than another because they are associated with another person on grounds of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.
- 4.4 **Discrimination by Perception** – this may occur where a person is treated less favourably than another because they are perceived to possess a protected characteristic ie. age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.
- 4.5 **Indirect Discrimination** – this may occur where a condition, rule, policy or practice applies on all employees or job applicants but particularly disadvantages a certain group of people who share a protected characteristic ie. age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status.
- 4.6 **Harassment** – this occurs when a person violates an employee’s dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for another employee. Employees who consider another person’s behaviour offensive because it violates a third person’s dignity can now complain of harassment.
- 4.7 Acts by employees to induce, pressurise or support another person to discriminate against an employee on the grounds of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation are also prohibited.
- 4.8 **Harassment by a third party** – this occurs when a person (not employed by Crown Agents) violates an employee’s dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for another employee.

Policy: Diversity Policy

Owner: HR

Effective date: May 2019

Revised:

Review due: May 2020

4.9 **Victimisation** – this could occur where an employee is penalised for having raised a discrimination complaint or concern in good faith or has assisted another in doing so.

4.10 Victimisation because a discrimination complaint was raised on the grounds on age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status are prohibited.

5 Application of Policy

5.1 In all areas of decision-making set out below, managers should be able to ensure that their decisions in any context can be justified on objective business grounds. Where managers are concerned that there could be a possible inference of discrimination arising from an intended decision, they should liaise with their Human Resources Director before making that decision.

5.2 The following paragraphs set out Crown Agents’ diversity policy in specific areas:

5.3 Recruitment and selection

- All employees will have equal opportunities in relation to an appointment to any role within the company subject to the requirements of that particular role and the individual’s skills, suitability and experience relevance to that role.
- Job vacancies will be advertised internally and externally to ensure as far as possible that job applicants are not limited to any specific groups.
- Job profiles/ Person specifications will contain an accurate description of the duties, and must only include qualifications, tests and criteria which are necessary and justifiable for the effective performance of the job.
- Decisions on job appointments will be made purely on the basis of a person’s merit and ability to meet fair and objective criteria.
- Managers will discuss the implications of any disability on the potential role with the employee or applicant concerned and will consider any reasonable adjustment(s) to the working environment or working arrangements prior to a final decision on the appointment being taken.

6 Terms and Conditions of Employment (promotion, pay, training, access to training or benefits)

6.1 Considerations of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status will play no part when considering access to training, or entitlement to other benefits, or salary levels.

6.2 Decisions on promotion and other career opportunities will be made purely on the basis of a person’s merit and ability to meet fair and objective criteria.

7 Performance Review

7.1 Considerations of age, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status will play no part when assessing an individual’s performance.

Policy: Diversity Policy

Owner: HR

Effective date: May 2019

Revised:

Review due: May 2020

7.2 A disability may be considered in this context either where an employee raises it or where it adversely affects the employee's ability to perform the essential requirements of the job. Reasonable adjustments to the working environment or to working arrangements will be considered.

8 Disciplinary (including performance) issues including Dismissal

8.1 Considerations of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status shall play no part when considering disciplinary action including dismissal against any employee.

8.2 A disability may be taken into account if it affects the employee's ability to perform the essential requirements of the relevant position. Reasonable adjustments to the working environment or to working arrangements will be considered.

9 Enforcement and Procedure for dealing with Discrimination-Related Complaints

9.1 Employees who believe that they have been discriminated against may raise this issue with his/her immediate supervisor or the Human Resources Director under the company's grievance procedure.

9.2 Where a complaint of harassment arises, employees should follow the procedure as outlined in the anti-harassment procedure.

9.3 Crown Agents regards any discrimination as misconduct and, after a proper investigation, anyone found guilty of such behaviour could face disciplinary action (up to and including immediate dismissal in cases of gross misconduct).

10 Monitoring

10.1 The Human Resources Director is responsible for monitoring compliance with this policy. This policy will be reviewed from time to time to ensure it achieves our objectives and the avoidance of unlawful discrimination.

11 Anti-Harassment Policy

11.1 Please see Crown Agents' Anti-Harassment Policy, which contains the procedure for dealing with harassment. This policy is available on the intranet.