

Equal Opportunities, Diversity and Equality Policy

Parias Construction & Interiors Ltd is committed to equality of opportunity in all aspects of employment. This has been written in conjunction with the 2010 Equal Opportunities Act.

Apart from compliance with the law, there are many other benefits to the business in promoting a culture of equal opportunity. These include:

- Improving recruitment decisions, through recruiting from a wide field.
- Improved selection methods.
- Cost and efficiency savings through the retention and development of quality staff, based on their abilities.
- Being known as a fair and ethical employer.
- Avoiding the potentially very high costs, and bad publicity, resulting from claims of discriminatory activity.

The purpose of this information is to ensure that the policy is fully understood, as well as to provide the framework to support its effective implementation within the business.

STATEMENT

Parias Construction & Interiors Ltd is committed to a policy of equal opportunities in all aspects of employment. This policy shall be applied in all aspects of work, including recruitment and selection, pay and benefits, facilities, promotion and training.

Special attention is given to interviewing, selection, recruitment and training to ensure that there is effective implementation of Company policy. Promotion is based upon ability, merit and performance taking into account the future needs of the Company.

The Company recognises that people are valued as individuals for moral and social reasons, as well as reasons related to business interests.

All employees and job applicants will receive fair and equal treatment regardless of their race, ethnic origin, religion, gender, sexual orientation, marital status or disability and irrespective of the permanent or temporary nature of employment.

The Company recognises that the regular monitoring of ethnic origin, sexual orientation, marital status and disability of employees and applicants is essential to the review of the effectiveness of the policy, and will commit to monitor its' performance against these indicators.

The Company will, where practical, actively encourage the interests of those groups under-represented within the business.

All forms of victimisation or harassment will be dealt with promptly, firmly and sensitively. No action will be taken without consulting the person being harassed, and the Company will act to support and protect the victim.

The Company will ensure that this policy is brought to the attention of every employee and job applicant, and that suitable and relevant equal opportunities training is provided as necessary.

All employees have a duty to assist the Company in ensuring that this policy is carried out in its entirety. Any allegations of unlawful discrimination will be treated seriously and dealt with confidentially.

The successful implementation of this policy depends upon the regular examination of progress towards equal opportunity. To this end the Administration Department will continuously review relevant policies and procedures.

RESPONSIBILITY

Managers and Supervisors have a responsibility for ensuring equal opportunities and preventing discrimination at all levels within the Company. They must ensure that no unacceptable behavior is taking place in the specific areas of the business for which they are responsible and take steps to ensure that it does not occur. They must also ensure that the staff for whom they are responsible know that such behavior is unacceptable and what to do if it occurs.

Managers and Supervisors have a responsibility to ensure that they do not ignore, trivialise or treat lightly grievances or complaints from members of a particular group or any complaint of discrimination on the assumption that the individual is over-sensitive about discrimination. All complaints must be treated seriously and if a Manager or Supervisor becomes aware that such behavior has occurred, they must respond appropriately. If the Manager or Supervisor is unable to deal with the matter for any reasons, they should refer the matter to the HR Manager immediately.

It is the duty of all employees to accept responsibility for the practical application of the policy, but at the same time, specific responsibilities fall upon Managers, Supervisors and individuals professionally involved in recruitment and selection, and those involved in the management of others. To assist suitable and relevant equal opportunities, training will be provided.

To make the policy work requires much more than a formal statement. The policy will help to create the necessary conditions for success, but it is for each employee to make his or her own contribution. To this end, the policy will be brought to the attention of every employee and job applicant, and will be kept under review.

All members of staff have a duty to co-operate with the Company to ensure that this policy is effective and to ensure that they and their colleagues are treated with respect and dignity. Employees have a positive duty to report any incidents of bullying, harassment or discrimination which they observe or become aware of.

They should also support colleagues who suffer harassment, discrimination or who are being bullied and are making a complaint. They should also make it clear to the colleagues that they find such behavior unacceptable.

LEGAL FRAMEWORK

The Race Relations Act (2000), the Sex Discrimination Acts (1975 & 1986), the Employment Act (2008), the Equal Pay Act (1970), Disabled Persons (Employment) Act (1944 & 1958) and the Equality Act 2010 make direct or indirect discrimination, including victimisation, illegal.

Each Act has a code of practice to advise and instruct all parties included. Two statutory bodies also exist to enforce the law and monitor its progress – Equal Opportunities Commission (EOC) and Commission for Racial Equality (CRE). These bodies can investigate any alleged case of discrimination. If they find that the law is being breached, they can issue a non-discrimination notice. If the requirements of the notice are not met, they can then seek an injunction against the employer.

Protection Under the Race Relations & Sex Discrimination Acts

These acts state that it is unlawful to discriminate on the grounds of race, colour, nationality (including citizenship) or ethnic or national origins.

It is also unlawful to discriminate on grounds of sex against men or women.

It is unlawful to discriminate on grounds of marriage against men or women. It is permissible, however, to offer to married people terms and conditions, which are not made available to single people.

It is not illegal to discriminate on the grounds of age. It is, however, contrary to recognised best-practice and should be avoided where practical.

Legislative requirements, reprinted, or summarised, from the relevant acts, are highlighted in the following text within boxes.

Equal Pay

This Act stipulates that there should be equal pay for work of equal value, regardless of sex, and irrespective of whether employees are full time or part time, permanent or temporary, apprentices, or over retirement age. The Act implies in every contract that each term of the contract of employment should be no less favourable to one sex than another. This includes sick pay, holiday entitlement and bonus payments, but excludes terms of special provision relating to pregnancy, certain aspects of pensions or death benefits, or differences of a genuinely material nature, which is not the difference of sex.

Types of Discrimination

- **Direct Discrimination**

By treating a person less favourably on grounds of sex or race than others would be treated in the same circumstances, e.g. offering employment to a man simply as a method of ensuring a more even balance of sexes within a department that may be heavily female biased.

- **Indirect Discrimination**

Indirect discrimination is usually unintended and results from applying requirements or conditions to a job, the effect of which one race or sex finds it harder to comply e.g. specifying GCSE English for a job where this is not required for the effective performance of the job, and where stipulation carries the likelihood of discriminating against some racial minorities who are less likely to hold this qualification as English may not be their native tongue.

Special care therefore must be taken, with consideration being given to issues involving, for instance, written skills, testing, physical demands, irregular or unsociable hours, or any other area likely to affect one group differently to another.

- **Victimisation**

By victimising people who have complained of facial or sexual discrimination, or who have provided information about such discrimination.

ROLE OF EMPLOYERS/MANAGERS

There are many areas of working where employees are vulnerable to discrimination (either knowingly or unknowingly), or to be discriminated against. This section indicates some of the key areas and provides guidance to ensure that an environment of equal opportunity exists.

Recruitment, Selection and Assessment

It is unlawful to discriminate, not only in recruitment, transfer and training, but also in the arrangements made for recruitment and in the ways of affording access to opportunities for promotion, transfer or training.

Job Criteria

Recruiters should draw up clear and justifiable job criteria and ensure these are objective and job related. This will help greatly in selecting the most suitable person for the job. Adherence to the published recruitment process will provide further detailed guidance.

Job criteria are provided by a job description and a person specification. The job description sets out the specific duties of the job. The person specification sets out the specific skills, qualifications, knowledge and personal qualities which are necessary to perform the duties effectively and safely. Recruiters must also ensure that all requirements are clearly related to the duties of the job. Careful use of this approach avoids the risk of inadvertently discriminating against any particular group of people.

Clear terms of reference, including objectively determined job grades also help to ensure that the Company meets its obligations with the Equal Pay Act. Without this, proof of compliance may be difficult.

Advertising

When advertising job vacancies, it is unlawful for employers to publish an advertisement which indicates, or could reasonably be understood as indicating, an intention to discriminate against applicants from a particular group.

Advertisements need careful wording to avoid overt or implied discrimination. It is essential to ensure that advertising is not confined to agencies or publications which effectively exclude, or reduce, the number of applicants of one sex, or who belong to a racial group.

When recruiting through employment agencies, job centres, careers offices and schools it is unlawful to give instructions (or bring pressure) to discriminate, e.g. by indicating that certain group will or will not be preferred.

Recruitment, therefore, should also not be confined to those sources, which, because of their particular source of applicants, provides only, or mainly, applicants of a particular type of group.

The only exception to this would be where sex is a genuine occupational qualification. This is likely to be an issue only:

- For reasons of decency or privacy
- Where the job is likely to involve working outside the UK in a country whose laws and customs are such that they prevent performance of duties by one sex. Certain middle eastern countries are a key example of this.

In general, all positions should be advertised internally within Parias Construction & Interiors Ltd. It would not be acceptable to avoid this on the basis that the recruiter knew either that there were no suitable candidates, or who the most appropriate incumbent would be. This will assist in reducing the likelihood of discrimination, as well as demonstrating the Company's commitment to equality of opportunity. In addition, copies of the Policy Statement will be sent to all employment candidates with any literature or initial correspondence.

Initial Application

Care should be taken to ensure that initial approaches are not subject to any form of discrimination. For instance, judgements should not be made of people on the basis of their appearance, accent or name. Those involved in meeting people must not act in a discriminatory manner by treating applicants from one sex or group less favourably than others.

Short Listing and Interviewing

It is unlawful to use recruitment methods, which exclude or disproportionately reduce the numbers of applicants of a particular group, which cannot be shown to be justifiable.

This should, where possible, be carried out by not less than two people, e.g. an administration specialist and a manager. Interviewers need to know that the applicant has the necessary qualifications, skills and experience. Interviewing should be conducted against the Terms of Reference/Person Specification. Recruiters, therefore, must understand these objective requirements, and evaluate candidates against them, and not against each other.

They must also not discriminate against, for example, married people, women, or men, despite any personal opinions regarding the suitability of one particular group over another. Questions relating to issues such as dependents, and marital status, even when asked for interest, could be misconstrued as discriminatory, and therefore care must be taken.

Discrimination must not be made where applicants are unable to complete an application unaided, unless personal completion is a valid test of the standard of English required for safe and effective performance of the job.

In considering qualifications, overseas attainments that are comparable with UK qualifications must be accepted as equivalents, and not assumed to be inferior.

Where any form of tests are used they must relate to the job requirements, and be checked regularly for relevance and freedom from bias. Parias Construction & Interiors Ltd meets with the guidelines of the EOC and CRE by ensuring that tests are only conducted and interpreted by staff that have been properly trained. Care must also be taken to ensure that standards in English or educational qualifications are not sought of a level higher than that needed for the job.

Progression

It is unlawful for employers to restrict access to opportunities for promotion or training in a way which is discriminatory.

Promotion

All employees should have an equal opportunity to progress within the organisation. The principles used for recruitment and selection should also apply to promotions. In general vacancies must be advertised internally in the first instance. This ideally will also include all new promotional opportunities, where it is considered that the likely candidate will come from within the Company. This will help in safeguarding against discrimination, as well as developing a culture of fairness within the business, and increasing the likelihood of better decision making through a more open and objective process. Where promotional opportunities are not advertised, managers must be able to objectively demonstrate why the individual chosen is considered to be the only suitable candidate.

Training and Development

Care must also be taken to ensure that discrimination of opportunity does not occur. In this area special programmes may be provided for an under-represented sex or racial groups, where that group has been excluded previously from, or under-represented in a job area for the previous twelve months.

Appraisals

It is unlawful to discriminate in the appraisal of employee's performance. Care should therefore be taken to ensure that discrimination does not take place in the construction of appraisals, application of assessment criteria, standards of objectives set or conclusions reached.

Benefits

It is unlawful to discriminate on racial grounds in affording terms of employment, and providing benefits, facilities and services.

Care must be taken to ensure that criteria governing eligibility are not unlawfully discriminatory. This may include the provision of overtime, opportunities for shift working call-out and standby or other opportunities.

Employees of ethnic minorities frequently request extended leave in order to visit friends and relatives living abroad. This is usually agreed to by allowing for some combination of paid and unpaid leave. Managers, however, must ensure that whatever arrangements are applied, they are made consistently across the business.

Cultural Needs

Where employees have particular cultural and religious needs which conflict with existing work requirements, then the requirements should be varied or adapted where reasonably practical. Examples may include:

- Not refusing employment as a Security Officer to a turbaned Sikh, where he could not wear the standard uniform hat.
- Making arrangements to allow the observance of prayer times and religious holidays for Muslims.
- Varying start and finish times to allow orthodox Jews to be home before sunset on a Friday.

Flexibility may, however, be required by both parties. For instance, the business should allow wearing of sarees and trousers by Asian women.

There are also circumstances where the adherence to genuine safety requirements may not constitute unlawful discrimination. It is recommended that specific advice be sought before any action is considered.

There is no legal requirement to provide language training, however, difficulties in communication can endanger equality of opportunity in the workplace. It is therefore recommended that, where reasonably practical:

- Provision of interpretation, translation, or sign language facilities are made available, particularly in the vent of redundancy or disciplinary issues.
- Training in English language/communication skills.

- Provision of communication through media other than speech; provision of pictorial safer signs may be particularly relevant.

Redundancy

In the occurrence of redundancy, measures will be taken to ensure that discrimination does not take place at any stage. This will include the training of all individuals involved in the process, ensuring that selection criteria are free from bias and that there is appropriate monitoring of the results.

Particular care must be taken to ensure that disabled staff are not disadvantaged, nor, for instance, there is selection of any particular group through targeting a project with a higher concentration of one race, or part times – often predominantly women.

Disciplinary, Grievance and Disputes

It is unlawful to discriminate in the operation of grievance, disputers and disciplinary procedures.

No employee should be victimised because they have complained about discrimination, or given evidence about such a complaint.

It is also important that any complaints regarding discrimination are not ignored or treated lightly, or that it is assumed that any particular group are over-sensitive to discrimination issues.

Where individuals of minority groups are subject to disciplinary procedures, Managers must give consideration to the effect on behavior of:

- Racial abuse or provocation
- Communication or comprehension difficulties
- Differences in cultural background or behavior

Harassment

It is unlawful to instruct or put pressure on others to discriminate, or to discriminate in response to instructions or pressure.

It is unlawful to victimise individuals who have made allegations or complaints of discrimination or provided information about such discrimination, for example, by disciplining or dismissing them.

The Company expects all employees to be able to work in an environment free of sexual and racial harassment and intimidation. It is the role of the Company, through its policies, processes, training and monitoring, to ensure that this is supported. It is the role of Managers to ensure this support is then actively utilised.

Sexual harassment means unwanted conduct of a sexual nature, or conduct based on sex, which is offensive to the recipient. Sexual harassment includes unwanted physical contact, suggestive remarks or behavior, leering, public display or sexual/offensive literature or posters, compromising invitations, demands for sexual favours and similar unwanted behavior. Such behaviours are frequently not seen as offensive by the harasser, and are often dismissed as just friendliness, or jesting. The Company recognises that this type of improper behavior which is unsolicited, is personally offensive, fails to respect the rights of others, lowers morale, interferes with work effectiveness and is unlawful.

Racial harassment means racial abuse or other racial provocation, which is offensive to the recipient.

ROLE OF EMPLOYEES

The primary responsibility for providing equal opportunity rests with the employer. Individuals at all levels and of all racial groups additionally have responsibilities.

Unlawful Actions

The following actions by individual employees would be unlawful:

- Discrimination in the course of their employment against fellow employees, or job applicants (e.g. bias in decisions regarding employment selection).
- Inducing or attempting to induce other employees, unions or managers to practice unlawful discrimination (e.g. refusal to work with a supervisor of a particular racial group).
- Victimising employees who have made allegations regarding discrimination or provided information about such discrimination.

Positive Actions

The following are positive actions recommended to promote equality of opportunity:

- Co-operation in measures designed to ensure equal opportunity including monitoring, training, and the provision of process procedures and policies.
- Where measures have not been introduced, they should press for their introduction.
- Draw attention to any suspected discriminatory acts or practices.
- Refrain from any harassment or intimidation even if given in jest. Such action may be misconstrued and may prove unlawful.

In addition, there are positive actions that can be taken by members of minority groups. These may include (where appropriate):

- Seeking means to improve their standard of English.
- Co-operating in language training schemes.
- Co-operating in training or other schemes designed to inform of industrial relations procedures, Company agreements etc.
- Participate in discussions with the Company to find solutions to any conflicts between business and cultural/religious needs.

OCURRENCES OF DISCRIMINATION, HARASSMENT OR BULLYING

Employees

If any employee feels they are being harassed or bullied they should, if possible, ask the person responsible to stop this behavior. If they do not stop employees should talk over their worries with someone with whom they feel comfortable to discuss the problem. This may be their manager, representative or colleague.

Any employee, who believes that the equal opportunities policy has been breached, should raise the matter through the normal grievance procedures.

Management

Complaints of bullying and/or harassment, or information from staff relating to such complaints, should be dealt with fairly, confidentially and sensitively. The complaint should be investigated promptly and objectively, and should be taken seriously. At first try to rectify the matters informally.



Where issues of discrimination or harassment have occurred, the action will be taken to ensure there is no repetition. Where this is the result of the activities of individuals then action under the Company disciplinary procedure will result.

MONITORING

Monitoring is central to the effective implementation of the Company's equal opportunities policies and action plans.

Monitoring also provides some of the information needed to gauge the extent to which equal opportunities policies and practices are succeeding, and the Company objectives are being met.

This will involve soliciting and/or collating of necessary information. All information provided about individuals is kept confidential and will be used only for monitoring equal opportunities.

Monitoring information will be sought through job application forms, and from applications made by letter/CV, by using (where practical) a separate monitoring form (see appendix). Reasons for rejection or selection of candidates will be maintained at each stage of the recruitment process. Monitoring of the current workforce will also be undertaken and maintained.

POSITIVE MEASURES

Although they are not legally required, positive measures are allowed by the law to encourage employees, and potential employees, and provide training for employees, who are members of under-represented (see note*) groups in particular work. Discrimination at the point of selection for work, however, is not permissible.

* Note: A group is under-represented if, at any time during the previous 12 months, either there was no one of that group doing the work in question, or there were disproportionately few in comparison with the groups proportion in the workforce at that establishment, or in the population from which the employer normally recruits for work at that establishment.

Marcus Parias

Director.....

Reviewed: 21st February 2025

APPENDIX

PARIAS CONSTRUCTION & INTERIORS LTD WORKING TOWARDS EQUALITY OF OPPORTUNITY

MONITORING FORM

Parias Construction & Interiors Ltd is committed to an equality of opportunity in all aspects of employment. A copy of the Equal Opportunities, Diversity & Equality Policy Statement accompanies for your information. The following questions will assist us in reviewing our progress. We should be grateful if you would complete and return the form to Admin, either by post, email or in person if you have a scheduled appointment.

Please note that there is no requirement to complete this questionnaire if you do not wish to. Responses will be used for monitoring purposes only, and do not form part of any decision relating the offering of employment.

Name: _____

Position Applied For: _____

Date: _____

Sex: _____

Marital Status: _____

Are you registered Disabled: _____

Ethnic Origin (please tick):

White (UK) _____ Black-African _____

Black-Caribbean _____ Black (other) _____

Chinese _____ Pakistani _____

Bangladeshi _____ Indian _____

Other (please state) _____