

## Equality and Diversity Policy

### 1.0 Introduction

This equality and diversity policy is designed to implement the commitment of Sovereign FM Ltd (sovereign) to equality and diversity. It is the responsibility of every employee to ensure his or her own conduct conforms to the expected standards and reflects this policy.

The aim of this policy is to encourage harmony and respect amongst individuals so as to promote good working practices with a view to maximising the performance.

If equal opportunities are not applied then valuable talent and potential are wasted. Moreover, when unfair discrimination, harassment, bullying or victimisation takes place, they bring about a climate of fear, insecurity and poor work performance. As well as being unlawful it affects profitability and morale. It is therefore vital that every employee understands his or her responsibilities. Equal opportunities is taken very seriously by Sovereign and wilful failure to apply the policies or evidence of discrimination, harassment, bullying or victimisation will result in disciplinary action which may include your dismissal.

### 2.0 The Equality and Diversity Policy

1. Sovereign FM recognises and accepts its legal obligations under the Equality Act 2010. Under this Act, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation are protected characteristics. Employees, other workers and applicants for employment who have one or more of these characteristics are protected from all forms of unlawful discrimination in the workplace, including: direct and indirect discrimination; discrimination by association; discrimination by perception; discrimination arising from disability; harassment; and victimisation.
2. We seek to employ a workforce that reflects the diverse community at large because we value the individual contribution of people irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
3. We will use our best endeavours to provide a working environment free from unlawful discrimination because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
4. We undertake to review periodically our recruitment and selection criteria and procedures to maintain a system where individuals are selected solely on the basis of their merits and abilities.
5. We undertake to review our employment practices, policies and procedures, including opportunities for training and promotion, pay and benefits, discipline, selection for redundancy and retirement, to ensure that we avoid all forms of unlawful discrimination in the workplace.
6. All employees will be treated with dignity and respect. Sovereign recognises that harassment, bullying and victimisation are forms of unlawful discrimination and we have

a separate policy statement on dignity at work, which deals with these issues (see below).

7. We will make reasonable adjustments to our recruitment and selection arrangements and procedures to ensure that no applicant for employment is disadvantaged because of a disability. Whenever reasonable and practicable, we will make adjustments to retain disabled workers in our workforce. This may include making reasonable adjustments to working arrangements and practices, making changes to the physical environment and/or providing auxiliary aids and services.
8. We will not tolerate acts which breach this policy and all instances of such behaviour or alleged behaviour will be taken seriously, fully investigated and may be subject to our disciplinary procedures. We further seek to give all employees equal opportunity and encouragement to progress within the organisation by implementing a positive action plan.
9. We will monitor and review the operation of this policy and will implement any changes required by law or to improve its effectiveness.
10. Any employee who believes that they may have been subjected to treatment that breaches this policy may raise the matter through our grievance procedure as outlined in the Staff Handbook.

### **3.0 Policy Statement on Dignity at Work**

1. Sovereign believes that the dignity of every person must be respected. Harassment and victimisation are forms of unlawful discrimination, which are unacceptable and will be regarded as gross misconduct. The highest standards of conduct are required of everyone regardless of seniority.
2. Harassment is defined as unwanted conduct that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Unwanted conduct of this nature can constitute harassment of an individual even if it is directed at another person. Harassment can take a number of forms:
  - Harassment may be unwanted conduct related to a protected characteristic. However, a person does not have to possess a protected characteristic to be a victim of harassment. Individuals who are subjected to harassment because of their association with someone who has a protected characteristic can also be victims. It is also possible for someone to be subjected to harassment because colleagues wrongly believe they have a protected characteristic. Unwanted conduct can include any kind of action or inaction, behaviour, exclusion, written or spoken words, jokes, imagery, or physical contact that the victim finds objectionable or offensive. The test of harassment is, at least in part, subjective.
  - Sexual harassment is unwanted conduct of a sexual nature. This can include any unsolicited or unwelcome conduct of a sexual nature, such as: making sexual advances; touching; staring; making inappropriate comments; telling sexual jokes; displaying or sending pornographic photographs or other materials of a sexual nature.

- Harassment can also be less favourable treatment of someone because they have rejected or submitted to unwanted conduct of a sexual nature or conduct related to sex or gender reassignment.
3. Condoning any form of harassment may be harassment in itself.
  4. The Employer accepts its responsibility for protecting employees from harassment by third parties, such as clients, customers and visitors. Employees are required to report any incidents of third party harassment immediately to their manager or supervisor.
  5. Victimisation occurs when someone is subjected to detrimental treatment because they have (or are thought to have) brought proceedings under the Equality Act, given evidence or information in support of proceedings or made allegations about any breach of the Act.
  6. Harassment and victimisation will be regarded as gross misconduct for disciplinary purposes. Accordingly, employees guilty of harassment or victimisation run a serious risk of summary dismissal.
  7. Equally, an allegation of harassment must not be made lightly. If it is found that an individual has made an allegation of harassment without foundation and maliciously or has given false evidence or information in relation to an allegation, then this will also be regarded as gross misconduct for disciplinary purposes.
  8. All complaints of harassment or victimisation should be made to your manager through the grievance procedure unless the complaint is regarding this person when you should complain to that person's superior.



Stephen McKeown  
**Operations Director**

Date: 31 January 2022