



## Equal Opportunities and Diversity Policy

### 1. GENERAL

Newline Logic Limited ('the Company'), trading as Daracore, embrace diversity and will seek to promote the benefits of diversity in all of our business activities. We will seek to develop a business culture that reflects that belief. We will seek to widen the media in which we recruit to ensure as diverse an employee and candidate base as possible. We will strive to make sure that our clients meet their own diversity target

The Company is committed to diversity and will promote diversity for all employees, workers and applicants and shall adhere to such a policy at all times. We will review on an on-going basis all aspects of recruitment to avoid unlawful or undesirable discrimination. The Company will treat everyone equally irrespective of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religious belief, political beliefs or membership or non-membership of a Trade Union or spent convictions, and places an obligation upon all staff to respect and act in accordance with the policy. The Company is committed to providing training for its entire staff in equal opportunities practice.

The Company shall not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. The Company will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the particular vacancy.

The Company will not accept instructions from clients that indicate an intention to discriminate unlawfully.

### 2. DISCRIMINATION

Unlawful discrimination occurs in the following circumstances:

#### Direct discrimination:

Direct discrimination occurs where one individual treats or would treat another individual less favourably on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs ("the protected categories").

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds of a protected category:

- In the terms on which the recruitment consultancy offers to provide any of its services;
- By refusing or deliberately omitting to provide any of its services;
- In the way it provides any of its services.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon a job registration from an employer which states that certain persons are unacceptable due to a protected category, unless one of the exceptions applies, for instance, the job demands a genuine occupational requirement or in the case of age, the discrimination can be lawfully justified.

#### Indirect Discrimination:

Indirect discrimination occurs where an agency or employer applies a provision, criterion or practice generally, which disadvantages a minority group in the community on the basis of a protected category.

Indirect discrimination would also occur if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from an employer.

If the vacancy requires characteristics which amount to a genuine occupational requirement or the instruction is lawfully discriminatory due to a statutory exception or objective justification, the Company will not deal further with the vacancy unless the client provides written confirmation of such genuine occupational requirement, exception or justification.

**Disabled Persons Direct Discrimination:**

Direct discrimination against a person occurs where, if for a reason which relates to the disabled person's disability, an individual:

- Treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply, and,
- The employer cannot show that the treatment in question is justified.

Or

If on the ground of a disabled person's disability, he treats the disabled person less favourably than he treats or would treat a person not having that particular disability, whose relevant circumstances, including his abilities, are the same as, or not materially different from, those of the disabled person. This type of direct discrimination can never be justified.

**Duty to make reasonable adjustments and to provide auxiliary aids and services:**

This is a similar protection to indirect discrimination in the other protected categories. Where a provision, criterion or practice applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be the duty of an employer to take such steps as are reasonable, in all the circumstances of the case, to remove the provision, criterion, practice or physical feature.

The Company must take reasonable steps to provide auxiliary aids or services if this would make it easier for the disabled person to use their services. For instance, an appropriate auxiliary aid or service can include the provision of information on audiotape or provision of a sign language interpreter.

The Company will not discriminate against a disabled person on the grounds of disability;

- In the arrangements i.e. application form, interview or arrangements for selection for determining to whom a job should be offered; or
- In the terms on which employment or engagement of temporary workers is offered; or
- By refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- In the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- By subjecting him or her to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

The Company accordingly make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Wherever possible the Company will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

**3. AGE DISCRIMINATION**

The Company will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skills and not age.

The Company is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age.

No age requirements will be stated in any job advertisements on behalf of the Company, though a minimum age may be applied for certain high risk activities.

The Company will request age as part of its recruitment process but such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the Company holds on all employees and workers and as part of its equal opportunities monitoring process.

**4. PART-TIME WORKERS**

This Diversity Policy also covers the treatment of those employees and workers who work on a part-time basis, the Company recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. The Company also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

## 5. HARASSMENT POLICY

The Company is committed to providing a work environment free from unlawful harassment on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or any other basis protected by legislation is unlawful and will not be tolerated by the Company.

This policy prohibits unlawful harassment by any employee or worker of the Company.

Examples of prohibited harassment are:

- Verbal or written conduct containing derogatory jokes or comments,
- Slurs or unwanted sexual advances,
- Visual conduct such as derogatory or sexually orientated posters, photographs, cartoons, drawings or gestures which some may find offensive,
- Physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected category basis,
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours,
- Retaliation for having reported or threatened to report harassment.

If you believe that you have been unlawfully harassed, you should make an immediate report to your immediate line manager followed by a written complaint as soon as possible after the incident. Your complaint should include:

- Details of the incident
- Name(s) of the individual(s) involved
- Name(s) of any witness(es)

The company will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

Any employee(s) who The Company finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination. (A person who discriminates or harasses may be personally liable for payment of compensation to the person offended, in addition to any compensation payable by The Company. There is no statutory cap on the amount of compensation which may be awarded in discrimination cases. Under the Criminal Justice Act 1994, harassment became a criminal offence, punishable by a fine of up to £5,000 and/or a prison term of up to 6 months. Under the Protection from Harassment Act 1997, the penalties for aggravated harassment are an unlimited fine and/or 5 years imprisonment).

## 6. GENDER REASSIGNMENT POLICY

The company recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

The company will support any employee or worker through the reassignment provided that full medical counselling has been undertaken and The Company has access to any relevant medical reports.

The company will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

All employees and workers will be expected to comply with The Company's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary sanction.

Where an employee is engaged in work where the gender change imposes genuine problems the Company will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should make recourse to the Company's grievance procedure.

## 7. COMPLAINTS AND MONITORING PROCEDURES

### Complaints Procedure:

All employees have a right to make a complaint if they feel they have been harassed, sexually harassed or bullied.

Anyone who believes that he/she has become subject to harassment directly or, who observes or has knowledge of harassment or bullying towards another employee or, group of employees, is advised to take the following steps immediately:

### Stage 1 – Informal Procedure:

The purpose of the informal procedure is to ensure that the majority of cases of this nature will be handled effectively and efficiently, in a confidential and sensitive manner, and at local level:

- If possible, a recipient of bullying, harassment or sexual harassment should approach the perpetrator(s) and ask him or her to stop.
- The employee should inform the individual(s) of the company's policy on sexual harassment and harassment or on anti-bullying and advise him / her that continuance of this behaviour will result in the employee making a formal complaint.
- The employee may approach their manager or another manager for support in approaching the perpetrator(s) or for advice if in doubt about whether the behaviour constitutes harassment, bullying or sexual harassment.

**Stage 2 – Formal Procedure:**

In the event that the informal complaint has failed or is inappropriate in the circumstances, the formal procedure should be used as follows:

- The employee should make a complaint to their Manager or Manager's Manager, preferably in writing.
- When a Manager receives a complaint, a copy must be forwarded to his / her Manager or the Managing Director.
- The alleged perpetrator(s) will be notified in writing of the details of the complaint.
- A person will be nominated by the management to examine the complaint and set up an investigation as necessary.

**Stage 3 – Investigation:**

In the event that the formal procedure does not resolve the issue the company may decide to invoke a formal investigation which would involve the following steps:

- An investigation will be carried out into the alleged offence by the nominated investigation team members.
- Should the gravity of the complaint warrant it, the investigation may be conducted by an independent consultant.
- The investigation will be conducted thoroughly, objectively, with sensitivity, confidentially and with due respect to the rights of all parties concerned.
- All parties concerned will be interviewed including any witnesses and each party will be informed of their right to be represented by a trusted colleague.
- Following the investigation, the employee and alleged perpetrator(s) will be provided with a written copy of the findings.

**Outcome:**

Following the above, the company will implement the following course of action:

- Should the results of a thorough investigation of an alleged incident reveal that an employee has engaged in actions or conduct which constitute harassment or bullying, appropriate disciplinary action will be taken, up to and including termination of the employment relationship, depending on the seriousness of the violation.
- The claimant will be notified in writing that a thorough investigation has been conducted and assured that appropriate corrective action has been taken.
- If the results of a thorough investigation of an alleged incident reveal that an employee has not engaged in actions or conduct constituting harassment or bullying the claimant and the alleged harasser will be immediately notified that a thorough investigation has been conducted and the results indicate that there are no grounds to substantiate the harassment or bullying allegation.

**Retaliation:**

Retaliation of any kind against an employee for complaining or taking part in any investigation in the context of this policy, or any adverse action taken against an employee, because the employee has lodged a harassment complaint, or participated in the company's investigation of a complaint, will give rise to appropriate corrective action, up to and including dismissal.

**False Accusations:**

Deliberately making false accusations, if proven, will result in the imposition of the appropriate disciplinary action to the complaining party.

**Monitoring and Training:**

The company agrees to monitor the implementation of its Equal Opportunity and Diversity policies and provide training as necessary.

Authorised by the Directors, for and on behalf of Newline Logic Limited, trading as Daracore:

Signed:  
  
Kevin Hodggers

Director

March 2020