

Equal Opportunities and Dignity at Work Policy

Reviewed January 2017

1. Statement of Intent

URBED is committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment and in our provision of consultancy services. This covers all aspects of employment including: recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

It is the policy of URBED to take all reasonable steps to employ and promote employees on the basis of their abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex and/or sexual orientation. In this policy, these are known as the 'protected characteristics'. The Company will appoint, train, develop and promote on the basis of merit and ability alone. URBED is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect. It is also the policy of URBED to take all reasonable steps to avoid discrimination in the provision of our consultancy services.

The Personnel Group is responsible for this policy and its implementation within URBED.

2. Definitions

2.1 The law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of the "protected characteristics" outlined above. It is generally unlawful to discriminate directly or indirectly, harass or victimise a member of the public based on any of the protected characteristics in the provision of services or goods.

It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service

providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

2.2 Direct Discrimination

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant, employee or member of the public is treated less favourably than others are treated or would be treated. The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the individual is associated and not on their own protected characteristic. In addition, it can include cases where it is perceived that an individual has a particular protected characteristic when in fact they do not. Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

URBED will take all reasonable steps to eliminate direct discrimination in all aspects of employment and provision of services.

2.3 Indirect discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees but which is discriminatory in its effect on, for example, one particular sex or racial group. Indirect discrimination occurs a provision, criterion or practice (PCP) is applied to an individual, and this is discriminatory in relation to a protected characteristic of that individual. A PCP is discriminatory in relation to a protected characteristic of the job applicants or employees if:

- It is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic
- The PCP puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it,
- It puts, or would put, the job applicant or employee at that disadvantage, and
- It cannot be shown to be a proportionate means of achieving a legitimate aim.

URBED will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

2.4 Victimisation

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have raised or supported a grievance or complaint of unlawful discrimination, or because they have issued employment tribunal proceedings for unlawful discrimination or they have given evidence in connection with unlawful discrimination proceedings brought by another employee. However, an employee

is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith. Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.

URBED will take all reasonable steps to eliminate victimisation in all aspects of employment and provision of services.

3. Recruitment

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in respect of abilities and qualifications. URBED is committed to applying its equal opportunities policy at all stages of recruitment and selection.

3.1 Advertisements

Advertisements will aim to positively encourage applications from all suitably qualified people and will avoid setting any unnecessary provisions or criteria, which would exclude a higher proportion of people with a particular protected characteristic. Generally we will advertise on our website, through our social media channels, and where appropriate through university notice boards and industry publications.

3.2 Selection and shortlisting

The selection process will be carried out consistently for all jobs at all levels. It will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job, and candidates will be assessed objectively against the requirements for the job. The staff responsible for shortlisting, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.

With disabled job applicants, URBED will have regard to its duty to make reasonable adjustments to work provisions, criteria or practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

All applicants will be interviewed by at least two interviewers. All questions that are put to the applicants will relate to the requirements of the job. Interview questions are the same or similar for all applicants, responses are recorded, and an objective assessment is made of responses.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be

discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

4. Employment

4.1 Training and promotion

All persons responsible for selecting employees for training or promotion will be instructed not to discriminate because of one or more of the protected characteristics. When a group of workers who predominantly have a particular protected characteristic appear to be excluded from access to promotion, training, or other benefits, systems and procedures will be reviewed to ensure there is no unlawful discrimination.

4.2 Equal Pay, Terms of employment, benefits, facilities and services

URBED is committed to equal pay and equality of terms in employment. All terms of employment, benefits, facilities and services will be reviewed from time to time in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics. Please also refer to our Pay and Benefits policy.

4.3 Grievances and complaints

All allegations of discrimination will be dealt with seriously, confidentially and speedily. URBED will not ignore or treat lightly grievances or complaints about unlawful discrimination from employees. Such complaints should be raised promptly under the terms of the Cooperative's grievance procedure. If the complaint involves bullying or harassment, the grievance procedure is modified as set out in the dignity at work guidance set out in section 5.2 below. Employees will not be penalised for raising a grievance, even if it is not upheld, unless the complaint was both untrue and made in bad faith.

5. Dignity at Work

URBED is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect. Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

5.1 Definitions

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Examples of bullying would include picking on someone or setting him/her up to fail or making threats or comments about someone's job security without good reason.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or

- is reasonably considered by that person to have the effect of violating his/her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the conduct.

Examples of harassment would include: physical conduct ranging from unwelcome touching to serious assault; unwelcome sexual advances; demeaning comments about a person's appearance; unwelcome jokes or comments of a sexual or racial nature or about an individual's age; excluding an individual because he/she is associated or connected with someone with a protected characteristic; repeated name calling related to an individual's religion or belief, ignoring an individual because he/she is perceived to have a protected characteristic (whether or not he/she does, in fact, have that protected characteristic); the use of obscene gestures; and the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Everyone has the right to decide what behaviour is acceptable to him/her and to have his/her feelings respected by others. Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to him/her, e.g. sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, e.g. certain "banter", flirting or asking someone for a private drink after work. In these cases, first-time conduct that unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to him/her. A single incident can be harassment if it is sufficiently serious.

5.2 Response

If you think you are being bullied or harassed, you may be able to resolve matters informally. The person may not know that his or her behaviour is unwelcome or upsetting. You may feel able to approach the person yourself, or with the help of someone else at the cooperative. You should tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the cooperative's grievance procedure. In the case of grievances about bullying or harassment, the normal grievance procedure is modified so that you can choose whether to raise your grievance with the Personnel Group or another Director.

All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a work colleague, friend or trade union representative of your choice at any meeting dealing with your grievance. You will be kept informed of the general progress of the process of investigation and the outcome of any disciplinary proceedings.

The cooperative will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.

You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.

6. Equal Opportunities in our consultancy work

URBED encourage participation in consultation events such as workshops, conferences and exhibitions from people of as varied and diverse a background as possible. While working within our clients' requirements, we aim to remove barriers to participation for all affected by our work. This could include using accessible venues and transport, planning events to be sensitive to religious holidays and taking account of accessibility, dietary or other cultural and religious needs. This would also include providing extra support for disabled stakeholders, people with care responsibilities or stakeholders with translation needs, in partnership with our clients.

URBED make clear that discrimination or harassment of any participants in our events on grounds of the protected characteristics set out above is not acceptable. We will challenge any such behaviour and exclude offenders from future events if there is no change in behaviour.

URBED ensure all publications can be made available in large print, translations or other accessible formats if requested by our clients. We make the vast majority of our publications available in digital formats on our website, which can be made accessible with the appropriate tools. We also check all of our publications for references that may be considered offensive or contrary to equal opportunities.

7. Policy Implementation and Support

URBED will ensure all employees and collaborators are familiar with this policy. We will offer training to help all employees to identify discriminatory acts or practices and to ensure that they promote equal opportunity within the cooperative. We will ensure all staff complete regular reviews of their work, enabling training needs to be identified and development targets set.

URBED keep clear and monitored records of:

- Gender, ethnic group and disability status of employees and applicants.
- Job applications and appointments
- Sick leave
- Disciplinary action/ grievances
- Staff working hours (via time sheets)
- Rates of pay and
- Training received, for all staff.

To monitor the diversity of job applicants, diversity and equality information is collected anonymously through an online survey, which can be viewed here: http://www.surveymonkey.com/s/URBED_equality. A report of the results is collated at the end of each recruitment process and is fed back to regular directors meetings.

URBED will regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equal opportunity is being achieved. This will also involve considering any possible indirectly discriminatory effects of its standard working practices. If changes are required, the Cooperative will implement them. The Cooperative will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

8. Employee Responsibilities

Every employee is required to assist the cooperative to meet its commitment to provide equal opportunities and avoid unlawful discrimination. Employees can be held personally liable as well as, or instead of, the cooperative, for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or clients are disciplinary offences and will be dealt with under the cooperative's disciplinary procedure. Conduct of this type will often be gross misconduct, which can lead to dismissal without notice. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

Employees should draw the attention of the Personnel Group to suspected discriminatory acts or practices. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or who has provided information about such discrimination. Such behaviour will be treated as potential gross misconduct under URBED's disciplinary procedure. Employees should support colleagues who suffer such treatment and are making a complaint.

9. Monitoring and Review

URBED review our policies annually and as issues are brought to our attention, to take account of new best practice and changes to legislation.

Signed by Director: David Rudlin
Director



Dated: 03/02/2017