

## **Equal Opportunities Policy**

### **1. Statement of Policy**

The aim of this policy is to communicate the commitment of the Managing Director and senior management team to the promotion of equality of opportunity in C.S. Todd & Associates Limited.

To this end, the Company will ensure all decisions on your employment and development and that of prospective colleagues are objective, based on merit and support business goals. This can be achieved through the continuous review of workplace policies, practices, procedures and behaviours to check that these are enabling all to give their best.

The Company is committed to maintaining good practice in relation to equal opportunities and will review our policies in this area on a regular basis in line with legislative changes and best practice benchmarking.

The Company is committed to the elimination of unlawful or unfair discrimination because of any of the nine Protected Characteristics under the Equality Act 2010 (the Act). These are:

- Age,
- Disability,
- Gender Reassignment,
- Marriage and Civil Partnership,
- Pregnancy and Maternity,
- Race, Religion or Belief,
- Sex and Sexual Orientation.
- Reporting, recording and investigation of accidents.

We are opposed to all forms of unlawful and unfair discrimination. All full-time and part-time employees and job applicants (actual or potential) will be treated fairly and selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

We recognise that the provision of equal opportunities in the workplace is not only good management practice, it also makes sound business sense. Our equal opportunities policy will help all employees to develop their full potential and the talents

#### **C.S. Todd & Associates Ltd**

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Certificate Number 860  
ISO 9001

and resources of the workforce will be fully utilized to maximize the efficiency of the organisation.

We are committed comply with all provisions under the Equality Act 2010. We are committed to:

- preventing any form of direct, indirect, associated or perceptive discrimination or victimization;
- promoting equal opportunities for all;
- securing fair participation for all staff, irrespective of religious belief;
- promoting equal opportunities for people with disabilities;
- promoting equal opportunities for ethnic minorities;
- promoting a good and harmonious working environment where all employees are treated with respect and dignity and in which no form of intimidation or harassment, including by third parties will be tolerated;
- fulfilling all legal obligations under the relevant legislation and associated Codes of Practice;
- taking any necessary positive/affirmative action, including setting goals and timetables.

The company recognises that the Equality Act 2010 makes it unlawful for staff to discriminate directly or indirectly, or harass customers or clients because of the protected characteristics of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision goods and services. Although discrimination in goods and services because of age is not yet covered by the Equality Act 2010, it is included as a matter of good practice.

Breaches of our equal opportunity policy and practice will be regarded as misconduct and could lead to disciplinary proceedings.

This policy is fully supported by all employees and has been agreed with them.

## **2. Implementation**

The Managing Director has specific responsibility for the effective implementation of this policy and we expect all of our employees to abide by the policy and help create the equality environment, which is its objective.

In order to implement this policy, we will ensure that:

- The policy is communicated to all employees, through induction training and made known to job applicants.
- All employees are aware of their responsibilities through appropriate and regular training.
- Appropriate training and guidance will be provided, including training on induction and management courses. In particular, all those involved in assessing candidates for recruitment or promotion will be trained in non-discriminatory recruitment and selection techniques.
- Consultation will take place with employees on the implementation of this policy and any amendments to practice.

- Adequate resources are made available to fulfil the aims of this policy.
- CSTA have appointed a member of staff as an Equalities Champion. Their role is to be a first point of contact for any concerns staff have regarding equality.
- The Equalities Champion are responsible for monitoring and assessing CSTA's public interface to ensure all equality matters are effectively managed.

### **3. Affirmation Action**

Where appropriate, lawful positive action measures such as special encouragement in advertisements or special training will be developed. These measures are available to us in certain circumstances, for example where there is an under-representation of a particular group in specific areas of work.

### **4. Monitoring and Review**

The provision of equality of opportunity between employees, irrespective of ethnic background or disability, may be monitored through the collection and analyses of statistical data on the community background, ethnic background, sex, marital status, family status and status as a disabled person of all full-time and part-time employees and job applicants. We will also monitor our workforce composition and undertake period reviews as required by legislation.

Progress on the implementation of this policy and any equal opportunities and affirmative/positive action programmes will be reviewed annually.

### **5. Complaints**

Employees who believe that they have suffered any form of discrimination, harassment or victimization including from third-parties are entitled to raise the matter through the grievance procedure. All complaints of discrimination will be dealt with seriously, promptly and confidentially. Employees may go directly to any member of the senior management team or they may choose to liaise with the Equalities Champion if preferred, who can then liaise with the senior management team on such matters.

These internal procedures do not replace or detract from the right of the employees to pursue complaints under the Equality Act 2010 to an industrial tribunal. Information on definitions of discrimination and time limits for raising complaints are set out in the Annex to this statement.

Every effort will be made to ensure that employees making complaints will not be victimized. Any complaint of victimization will be dealt with seriously, promptly and confidentially. Victimization will result in disciplinary action and may warrant dismissal.

## **ANNEX**

### **Direct Discrimination**

Direct discrimination occurs when a person is treated less favourably than another on the grounds of their sex, marital status, religious belief, political opinion, race, nationality or ethnic/national origin.

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Indirect discrimination can occur when a requirement or condition, which cannot be justified on grounds other than sex, marital status, religious belief, political opinion, race, nationality or ethnic/national origin, is applied equally but has the effect in practice of disadvantaging a considerably higher proportion of persons in one or other of the above groups.

In order to establish a complaint of indirect discrimination, an applicant must show the following:

- that a requirement or condition has been applied;
- that the said requirement or condition adversely impacts against the person because of his/her religious belief, political opinion, sex, marital status, race, nationality, or ethnic/national origin;
- that he/she has suffered detriment by reason being unable to comply with the condition or requirement.

### **Associative Discrimination**

Associative Discrimination occurs when someone is directly discriminated against because they associate with another person who possesses a protected characteristic (except in marital/civil partnership status).

### **Perceptive Discrimination**

Perceptive Discrimination occurs when someone is directly discriminated against because others think they possess a particular protected characteristic (other than marriage or civil partnership) even if they do not actually possess it.

### **Disability Discrimination**

Disability discrimination occurs when, for a reason related to his/her disability, a disabled person is treated less favourably than other people, and this treatment cannot be justified. It also occurs when an employer fails to comply with the duty to make a reasonable adjustment in relation to the disabled person, and the failure cannot be justified. An employer cannot justify less favourable treatment if, by making a reasonable adjustment, it would remove the reason for the treatment.

## Harassment

Harassment is unwanted conduct related to a protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees need not possess the relevant characteristic themselves and may be protected because of perception or association.

## Victimisation

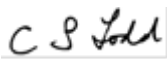
Victimisation occurs when an employee suffers a detriment because they have made or supported a complaint or raised a grievance under the Equality Act or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

## Complaints

Complaints of discrimination would need to be lodged with an employment tribunal within three months (minus a day) from the date of the alleged act of discrimination.

In respect of equal pay, the complaint can be lodged at any time while the person is in the job or within six months of leaving a job.

Date: 1.5.22

Signature: 

Name: Colin Todd

Position: Managing Director