

WDS-QMP-105	<b>Equal Opportunities and Harassment Policy</b>			Rev 1	Pg 1 of 3
Issued by:	JAD	Date:	01/Oct/2021	Approved:	JAD

## Equal Opportunities and Harassment Policy

This sets out the Company's policy on equal opportunities. WDS is committed to a policy of treating all its employees, job applicants, clients, customers and suppliers equally.

### Principles

- (a) There should be no unlawful discrimination on account of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. These are known as protected characteristics under the legislation.
- (b) Discrimination can take the form of a number of possibilities:
  - Direct Discrimination** – where someone is treated less favourably than another person because of a protected characteristic.
  - Indirect Discrimination** – where a rule or a policy that applies to everyone within the organization can disadvantage people with a particular Protected Characteristic unless that required characteristic can be justified by showing that it was a reasonable characteristic to enable you to manage your business, i.e., that it is 'a proportionate means of achieving a legitimate aim'.
  - Associative discrimination** – where direct discrimination takes place against a person because they associate with someone who has a Protected Characteristic e.g., where an employee is discriminated against due to her being a carer of her disabled son.
  - Discrimination by Perception** – where direct discrimination takes place against someone because others think they possess a Protected Characteristic, whether they do or not e.g., where an employee is discriminated against because he is thought to be gay even though he is not.
- (c) WDS will appoint, train, develop, reward and promote on the basis of merit and ability.
- (d) All employees have personal responsibility for the practical application of the Company's Equal Opportunities Policy, which extends to the treatment of job applicants, employees, clients, customers, suppliers and visitors.
- (e) Special responsibility for the practicable application of the Company's Equal Opportunities Policy falls upon directors, managers and supervisors involved in the recruitment, selection, promotion and training of employees.
- (f) The Company's Complaints Policy is available to any employee who believes that he or she may have been unfairly discriminated against or harassed. Employees will not be victimized in any way for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and as soon as possible.
- (g) Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment will be treated as gross misconduct. Allegations of discrimination which are not made in good faith will also be considered as a disciplinary matter. Confidential records of ongoing matters dealt with in accordance with this policy will be kept.
- (h) In the case of any doubt or concern about the application of this policy in any particular instance, consult a manager.
- (i) The Company will keep under review its policy, procedures and practices on equal opportunities.

### Equal Opportunities Code of Practice

- (j) WDS has introduced this Equal Opportunities policy as a commitment to make full use of the talents and resource of all its employees and to provide a healthy environment which will encourage good and productive working operations within the organization. This code of practice describes how the policy is to be applied throughout the Company.
- (k) The Company is particularly concerned that equality of opportunity is maintained in the following areas:
  - recruitment and selection;
  - promotion, transfer and training;

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terms of employment, benefits, facilities and services;  
grievances and disciplinary procedures;  
dismissals and redundancies.

**Recruitment and Selection**

- (l) The following principles should apply whenever recruitment or selection for positions takes place:
  - individuals will be assessed according to their personal capability to carry out a given job;
  - assumptions that only certain types of people will be able to perform certain types of work must not be made;
  - any qualifications or requirements applied to a job which have or may have the effect of inhibiting applications from certain types of people should only be retained if they can be justified in terms of the job to be done;
  - recruitment solely or primarily by word of mouth should be avoided if its effect is or may be to prevent certain types of people from applying;
  - selection tests should be specifically related to job requirements and should measure the person’s actual or inherent ability to do or train for the work;
  - selection tests should be reviewed regularly to ensure they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism;
  - applications from different types of people should be processed in the same way;
  - written records of interviews and reasons for appointment and non-appointment should be kept;
  - questions should relate to the requirements of the job; if it is necessary to assess whether personal circumstances may affect job performance, this should be done objectively without questions or assumptions being made which are based on stereotyped beliefs about certain types of people;
  - where the Company’s arrangements for recruitment and selection put disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or if that is not reasonably practicable, reduce the disadvantage unless objectively justified;
  - no decisions regarding recruitment or selection should be made by a person who has not read and understood this policy.
- (m) Pre-employment medical questionnaires will not usually be used by the Company unless in the following circumstances:
  - To make reasonable adjustment to facilitate interviewing for the job
  - Equality monitoring
  - To explore whether a prospective employee is able to undertake a function which is intrinsic to the work

**Promotion, Transfer and Training**

- (n) The following principles should apply to appointments for promotion, transfer and training:
  - assessment criteria and appraisal schemes should be carefully examined to ensure that they are not unlawfully discriminatory;
  - assessment criteria and appraisal schemes should be monitored and, where such criteria or schemes result in predominantly one group of workers gaining access to promotion, transfer or training, they will be checked to make sure this is not due to any hidden or indirect discrimination;
  - promotion and career development patterns will be monitored to ensure that access to promotion and career development opportunities in particular groups of workers are not unjustifiably being excluded;
  - traditional qualifications and requirements for promotion, transfer and training, such as length of service, and age, which may discriminate against certain groups of workers shall be reviewed and will only continue to be applied if genuinely justified;

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policies and practices regarding selection for training, day release and personal development should not result in an imbalance in training between groups of workers unless this is objectively justified;

where the Company's arrangements in relation to promotion, transfer or training put disabled workers at a substantial disadvantage for a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless objectively justified.

**Terms of Employment, Benefits, Facilities and Services**

(o) The following principles shall apply to terms of employment, benefits, facilities and services:

the terms of employment, benefits, facilities and services available to workers should be reviewed regularly to ensure that they are provided in a way which is free from unlawful discrimination;

part-time workers should receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified;

where the Company's arrangements relating to terms of employment, benefits, facilities and services put disabled workers at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless otherwise objectively justified;

pay and bonus criteria, policies and arrangements should be carefully examined and monitored, and if it appears that any group of workers are disadvantaged by them, they will be checked to make sure that this is not due to any hidden or indirect discrimination.

**Additional Policy Information**

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Key Reference Material      WDS-QMP-112: Complaints Handling Policy

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The policy review date is 01/Oct/2024

**John Durban**

**Director**

**Signed:**

**Date: 01/Oct/2021**