

The Equality Act passed into law on 6 April 2010 and many of its provisions came into effect in October 2010. The intention of the Act is to harmonise the fragmented discrimination legislation, it also introduces some new restrictions which affect employment.

Recruitment

We will always recruit by using a job specification that identifies experience, qualifications and skills required for it to ensure that all requirements are adhered to.

Selection of applicant will be consistent with equality of opportunity and when deciding upon the right person for the position, we will not discriminate, whether consciously or unconsciously, in making this decision. We will always check competence records, experience, skills, qualifications, and the right to work in the UK as part of the selection process including any conditions attached to work visas or permits are complied with.

Advertising job vacancies will be through a consistent, non-discriminatory approach with successful applicants being considered solely on their ability to do the job.

Interview questions will be related to the requirements of the job and will not be of a discriminatory nature. A record of interview is maintained and held for 1 year post the interview for unsuccessful candidates.

Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.

Single Equality Scheme

Carbis Filtration Limited aims to be a truly inclusive company, which is open to all sections of local, national, and international communities.

The Company recognises the benefits of a diverse workforce and is committed to providing a working environment that is free from discrimination. The Company strives to comply with best practice and to abide by the provisions of the Equality Act 2010 and all associated legislation.

The Company will seek to promote the principles of equality and diversity in all its dealings with employees, workers, job applicants, clients, customers, suppliers, contractors, recruitment agencies and the public.

All employees, workers and those who act on the Company's behalf are required to adhere to this policy when undertaking their duties or when representing the Company in any other guise.

Equality & Diversity

We aim to encourage, value and manage diversity and are committed to providing equality for all in order to secure the widest pool of talent possible by selecting a workforce that is representative of the communities from which we obtain them. We have an E&D representative with the General Manager, which ensures that we encourage representative selection from this pool and to implement equality and diversity, set objectives then monitor success and compliance.

Carbis Filtration Limited believes work is most effective when we work as a team pooling our skills, aptitudes, interests and backgrounds. Teams which are diverse are able to cope with the wide variety of challenges and opportunities in modern life and work. Training, development and progression opportunities are available to all staff. We will protect our employees from discrimination because of race (including ethnic origin, colour, nationality and national origin), age, disability, religion or belief (including philosophical belief), sex and sexual orientation, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, social background or appearance. Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.

While positive measures may be taken to encourage under-represented groups to apply for employment opportunities, recruitment or promotion to all jobs will be based solely on merit. All employees will have equal access to training and other career-development opportunities appropriate to their experience and abilities. However, the Company may take appropriate positive action measures (as permitted by equal opportunities legislation) to provide specialist training and support for groups that are under-represented in the workforce and encourage them to take up training and career-development opportunities.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the company. We will treat all people with equal value. Decision making will be based on merit. We are committed to the principle of equality in our paid reward system for our employees and will eliminate any bias in our pay system. Pay and benefits will be in line with current legal requirements in force, will be detailed on a written pay statement and will be paid in line with role, responsibility and skills of the position held. The written statement will identify fixed pay deductions (amounts and reasons) and will be made available before the pay date.

We recognise that all people are equally deserving of respect and we will ensure that they have the opportunity to develop to their full potential and give of their best. Equality of opportunity does not mean that everybody is the same or should be treated in exactly the same way. It means that everyone should be respected for their own characteristics and abilities and that they should be treated in ways which make the best of those abilities. In practice this means that Carbis Filtration Limited will work to ensure that in those places where it has influence, we will promote and enforce respect, tolerance, thoughtfulness and goodwill to shape the best behaviour in everyone. Their opposites – racism, violence, rudeness, offensive names or ‘jokes’, harassment of individuals or small groups of people, bullying, the display of pornographic or racist material, ignoring or shunning people – are not acceptable and are likely to attract disciplinary measures.

Achieving greater diversity and equality of opportunity is a practical matter, requiring careful thought, determined action and persistence. Success is measurable in the quality of the company, as it affects the wellbeing of every member of staff. The laws of the United Kingdom have promoted equality of opportunity for many years. There is legislation forbidding unfair discrimination. This legal framework is being constantly refined and updated. Carbis Filtration Limited will ensure that, in meetings, staff and contractor briefings, a requirement to comply with relevant law is made clear.

We work with our suppliers through procurement and endeavour to ensure that the purchase of goods, services and facilities is undertaken in line with our equality and diversity commitments, and that we use suppliers as preferred where they share our values on equality of opportunity and diversity.

Our Statutory Duties

For the first time, The Equality Act 2010 brings together all of the legal requirements for the private, public and voluntary sectors to make existing equality laws simpler, more effective and easier to understand. It was brought in to consolidate and harmonise all previous acts relating to protected characteristics.

Previous Acts and regulations which the Equality Act repeals include the following:

- The Equal Pay Act 1970.
- The Sex Discrimination Act 1975.
- The Race Relations Act 1976.
- The Disability Discrimination Act 1995.
- The Employment Equality (Religion and Belief) Regulations 2003.
- The Employment Equality (Sexual Orientation) Regulations 2003.
- The Employment Equality (Age) Regulations 2006.
- The Equality Act (Sexual Orientation) Regulations 2007.

We take active steps to identify and address issues of discrimination where there is evidence of prejudice, harassment or victimisation, lack of understanding, disadvantage, or lack of participation for individuals with protected characteristics. We are committed to applying the duties not to just the three legislated areas but to extend the requirement to all seven protected groups.

To do this we will:

- Assess the impact of its policies on staff from different racial groups;
- Monitor the admission and progress of staff and the recruitment and career progress of staff by racial groups;
- Set out Carbis Filtration Limited's arrangements for publishing the results of assessments and monitoring;
- Report annually the results of assessments and monitoring.

Meeting our Duties

We will seek to ensure that:

- The Managing Director, staff and customers are aware of our equality and diversity policy, its' directives and the action needed for its implementation;
- Staff and customers are aware of the value placed upon equality of opportunity and that action will be taken in the event of any breach of the policy;
- The Managing Director and staff have access to comprehensive information, which assists them to plan, implement and monitor actions to carry out their responsibilities under the policy;
- We set pay, benefits and any subsequent pay review in line with all current legislation and based on role, responsibility and skills of the position and no other discriminatory factor.
- We respond to problems raised, informally or through the formal grievance procedure, effectively and efficiently.

Discrimination can come in one of the following forms:

- direct discrimination - treating someone with a protected characteristic less favourably than others.
- indirect discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage.
- harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them.
- victimisation - treating someone unfairly because they've complained about discrimination or harassment.

Unlawful Discrimination

Unlawful discrimination of any kind in the working environment will not be tolerated and the Company will take all necessary action to prevent its occurrence.

Specifically, the Company aims to ensure that no employee or job applicant is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, gender reassignment, race (including colour, nationality, caste and ethnic origin), disability, sexual orientation, marital status, part-time status, pregnancy or maternity, age, religion or belief, political belief or affiliation or trade union membership. This commitment applies to all aspects of employment, including:

- Recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
- Training.
- Promotion and career-development opportunities.
- Terms and conditions of employment, and access to employment-related benefits and facilities.
- Grievance handling and the application of disciplinary procedures.
- selection for redundancy.

Equal opportunities practice is developing constantly as social attitudes and legislation change. The Company will review all policies and implement necessary changes where these could improve equality of opportunity. The Company actively promotes equality of opportunity for all existing and potential employees, including those with criminal records where appropriate. Anyone who feels that they have been subject to discrimination should represent this to a Director or senior manager. Anyone who feels that they are becoming a victim of harassment or bullying can be assured of a sympathetic hearing from our management team. The simplest and sometimes the best response is to ask the person who has given offence to stop and for a simple apology to end the matter. That can be inappropriate where the offence is serious or repeated, despite clear indications that it is hurtful or offensive. It can also be impossible; where information technology has been used to harass or bully, for example. However the problem is to be tackled, act promptly, without waiting for it to become intolerable or to threaten wellbeing or health.

There is a separate harassment and bullying section – Appendix A to this document that explains this and what should be followed.

The Company requires existing and potential employees to provide details of any criminal record at an early stage in any application process. Any such information should be sent in a separate confidential letter to the designated person. Only those who need to see it as a formal part of the recruitment process will have access to this information. Having a criminal record will not necessarily prevent a candidate from being appointed. Any recruitment decision will depend on the nature of the position and the circumstances and background of the offence(s) which will be discussed with the candidate.

Protected Characteristics - Types of Discrimination

We are aware of the protected characteristics and as a company we will ensure that there is equality and no discrimination against any of these for workers directly employed by us, a contract worker, trainees, apprentices and business partners. We explain each as follows to ensure that there is no confusion over what will not be tolerated and to provide some examples of what to avoid.

We will not:

- Treat a worker worse than another worker because they are **associated with** a person who has a protected characteristic.
- Treat a worker worse than another worker because you incorrectly think they have a protected characteristic (**perception**).
- Treat a disabled worker **unfavourably** because of something connected to their disability where we cannot show that what we are doing is **objectively justified**. This applies where we know or could reasonably have been expected to know that the worker is a disabled person. (**discrimination arising from disability**).

- Do something including making a decision, or applying a rule or way of doing things which has (or would have) a worse impact on a worker and on other people who share a particular protected characteristic than on people who do not have the same characteristic, unless we can show that it is **objectively justified** to do so. (**Indirect discrimination**)

The protected characteristics are:

- Age.
- Gender reassignment.
- Being married or in a civil partnership.
- Being pregnant or on maternity leave.
- Disability.
- Race including colour, nationality, ethnic or national origin.
- Religion or belief.
- Sex.
- Sexual orientation.

Gender Identities, Gender Reassignment, Sex and Sexual Orientation

Unacceptable behaviour may be directed towards gender identities such as men, women transgender, gender neutral, non-binary, agender, pangender, genderqueer, two-spirit, third gender, and all, none or a combination of these. It may consist of unwelcome name-calling; 'jokes'; hostile attitudes towards particular groups of people that override consideration for the individual; suggestive, vulgar or sexually explicit language and pictures; or unwanted physical contact. Where someone makes it clear that they find language or behaviour objectionable, it should stop and must stop. Continuation may well be harassment or bullying.

Some examples of behaviour to avoid are:

- Sexually suggestive comments and gestures.
- Unnecessary physical contact.
- Derogatory remarks about people of a particular gender or sexual orientation.
- Unwelcome requests for social and sexual relationships.
- Display or sharing of pornographic or sexually revealing pictures.
- Indecent exposure or sexual assault; these are likely to be criminal acts.

Race (ethnic origin, colour, nationality, and national origin)

Racial abuse may be directed at gender identities. This includes name-calling; 'jokes'; hostile attitudes towards groups of people that override consideration for the individual; language or behaviour, which is known to be unacceptable to the culture of a person from a different ethnic background; and criticism of dress or appearance. In the United Kingdom, where British people come from a wide range of different ethnic groups, it is possible for a person from any background to give offence accidentally or through ignorance. When it is made clear that offence has been given the proper response is to stop and apologise.

Some examples of behaviour to avoid:

- Ridicule for physical or cultural difference.
- Exclusion from the activities of the rest of the group, in learning or socially.
- Unfair allocation of work or responsibility.
- Racist comments, graffiti or wearing of insignia.
- Unreasonable rejection of traditional dress.
- Abuse, threats or attacks; these are likely to be criminal acts.

Religion or belief.

Religion is becoming a more prominent feature of life than it has been previously, due to media. This applies to all religions even though it is most often remarked on in relation to Islam. It is not illegal to challenge religious beliefs but it may cause greater offence than was intended. We need to be mindful of others and their beliefs and never judge, exclude or criticise because of it or because it is different to yours.

Some examples of behaviour to avoid:

- Teasing or criticising unreasonably dress codes, which may be important to believers in a particular religion.
- Mocking other people's beliefs, particularly in front of a group or in public.
- Acting on an assumption that people of a particular religion all have the same qualities or characteristics.

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Disability

People with a wide range of disabilities are increasingly able to live a full life and work alongside able colleagues. The ability to work and develop at Carbis Filtration Limited is an essential foundation for that widening of opportunities. The help and encouragement of every member of the company is an important part of that support.

We will make sure that a disabled worker has the same access, as far as is reasonable, to everything that is involved in doing a job as a non-disabled worker (**reasonable adjustments**).

Some examples of behaviour to avoid:

- Name-calling referring to a disability.
- Exclusion from the activities of the rest of the group.
- Unthinking assumption about what a person with disabilities can achieve or do.
- Giving unwanted and uninvited help.

Pregnancy and Maternity

Women who are pregnant, have a related illness or are on maternity leave will be treated the same as others and will never be treated **unfavourably**. This will apply as required by law from the time she tells the company she is pregnant to the end of her maternity leave (i.e., the **protected period**).

We will ensure that there is no discrimination and will work with our employees to implement reasonable adjustment, where we are able, following completion of a specific risk assessment. We will discuss any potential health and safety reasons for actions with them to always keep the pregnant person and her baby safe.

Age

We will not discriminate on the grounds of age and will ensure that employment and opportunity is not based on age nor restricted by it.

Marriage and Civil Partnership

We respect decisions made by employees and will abide by the laws in place to ensure that marriage and civil partnership is not a basis when making decisions associated with recruitment, promotion and termination of employment or redundancies.

We will treat every employee fairly, providing salary and wage, holidays, etc commensurate with ability and statute in place and regardless of marriage, civil partnership or dependents applicability.

Monitoring

We capture information relevant to equality and diversity and present this in a format that will provide relevant analysis to top management in order to monitor and evaluate the effectiveness of this policy and to allow informed judgement to be made for setting any objectives

Data that may be captured and analysed against discriminatory indicators includes:

- Profiles of employees by grade / salary scales and types of work.
- Job application rates.
- Selection success rates.
- Allocation of employment and training contracts (permanent, fixed-term part-time, fixed-term full-time);
- Training / staff development records.
- Promotion application and success rates.
- Disciplinary / capability proceedings.
- Grievances.
- Leaver interviews.
- Pay statistics.

Where available, we will use external information to benchmark our results against and implement equality impact assessments (where necessary) to get to the root cause of the inequality.

We capture information from application and recruitment through to dismissal, retirement or resignation. The following are some examples of data which are monitored:

- Applications for staff positions from people of different ethnicity / gender in comparison with their representation in the local community.
- Successful selection rates of different groups in comparison with applications.
- Successful achievement rates of qualifications among different groups of staff.
- Promotion of staff according to ethnicity / gender in comparison with average rates of promotion.

Action

We will review our processes and practices where we discover inequality. This could be that our company is not representative or where it appears that specific sections are not progressing as others are. Action will be taken where:

- Monitoring shows that some groups do not appear to succeed as well as others.
- it is discovered from investigation or equality impact assessment that this is not solely attributed to the most suitable person during recruitment and selection.
- A grievance is deemed to be justified.

Who is responsible?

Everyone who is part of or associated with Carbis Filtration Limited is personally responsible for actively promoting the values described in this policy.

Leadership in diversity and equal opportunity issues is carried out by the following people:

- Managing Director
- Management.

The *Managing Director* of Carbis Filtration Limited:

- Appoints a member of staff to champion this policy and monitor its' effectiveness and a central point of contact for those who have concerns.
- Sets and monitors diversity and equality targets annually.
- Approves and monitors the annual development plan (KPIs)
- Monitors improvements in diversity and equality over time.
- Takes responsibility for safeguarding vulnerable people.
- Reflects on its own performance in diversity and equality matters.
- Implements an equal pay, benefits and pay review structure in line with current legislation.

Managers:

- Explain to staff what they are monitoring and why.
- Present information in a manner which will effectively communicate the message to them.
- Monitor the implementation of Carbis Filtration Limited equality and diversity policy with key indicators of performance which are included in an Action Plan and performance reviews.
- Reassure those providing the information for analysis and monitoring that it will remain confidential.
- Ensure that every employee, learner and apprentice have the same access to training, promotion and other opportunities in order to reach their full potential.

Complaints of Discrimination

The Company will treat seriously all complaints of discrimination made by employees, clients, customers, suppliers, contractors or other third parties and will act where appropriate.

If an employee or worker believes that he or she has been discriminated against, they are encouraged to raise the matter as soon as possible with a manager or other senior employee using the Company's Grievance Procedure (outlined within the Company Handbook).

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If an allegation of discrimination is made, the Company is committed to ensuring that the complainant is protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's Disciplinary Procedures.

During the course of the investigation, the individual or individuals who are accused of discrimination will be given the opportunity to respond to the allegations and provide an explanation.

If the investigation concludes that any claim is false or malicious, the complainant may be subject to disciplinary action.

If the investigation concludes that actions occurred which amount to unlawful discrimination, disciplinary action will follow which covers sanctions up to and including dismissal without notice for gross misconduct.

Positive Action

Many occupations are mainly historically, associated with a particular gender or ethnic group. For example, a predominance of men in a job role may have been previously justified by a need for physical strength at one time. In the vast majority of jobs this is no longer the case but the stereotype may live on. Employers are therefore denied access to the range of talent they need for reasons which make no sense. Where Carbis Filtration Limited finds issues of this kind we will work actively to overcome them for the benefit of both employers, employees and learners.

Linked policies and procedures

This policy statement is intended to help guide everyone in Carbis Filtration Limited towards behaviours and attitudes, which reflect the best aspects of our society. Nevertheless, where people transgress, sanctions are laid down in a number of associated statements:

- Capability & Disciplinary Policy.
- Grievance Policy.
- Modern Slavery Policy.
- Whistleblowing Policy.
- Corporate Social Responsibility and Ethical Policy.
- Anti-Bribery and Corruption Policy.

Commitment

The policy has my full support. All employees and workers are required to comply with the Company's equality aims, to familiarise themselves with our equality of opportunity, and above all to treat colleagues with dignity and respect.



Simon Riley
Managing Director

Appendix 1 – Bullying and Harassment

Harassment

In the Equality Act 2010, harassment is defined as ‘unwanted conduct related to a relevant 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 includes any act, expression, statement (verbal or written) or visual display, which is unsolicited, unwelcome, offensive, objectionable or intimidating – and any incitement to others to behave in such ways. Harassment is usually, implicitly or explicitly, related to or based on the personal characteristics of an individual or group – such as age, disability, religion, nationality or national origin, race or ethnic origin, sex and sexual orientation. It is the effect of the behaviour of the individual or group against whom it is directed, not the intentions behind this behaviour, which determines whether it is harassment.

Harassment can affect their dignity or self-esteem, causes them discomfort or distress, leads them to feeling excluded or isolated, results in them feeling intimidated or patronised and withdrawing from normal everyday social interaction.

For example, a person can subject another to harassment if:

- On the grounds of their sex, they engage in unwanted conduct that is related to their sex or that of another person, which has unwanted effects such as violating her dignity.
- Of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, or
- They engage in any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating her dignity; or
- On the grounds of their rejection of or submission to unwanted conduct (of this kind), they treat them less favourably than they would treat them had they not rejected or submitted to the conduct.

Bullying

Bullying is not specifically defined in law but is not tolerated in any form by our company. ACAS guidance definition states ‘Bullying may be characterized as offensive, intimidating, malicious or insulting behavior, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient’. Bullying includes the abuse of power or authority in such a way that an individual is treated with contempt and indifference, undermined, and unreasonably criticised in public or private.

Examples include (the following list is not exhaustive):

- Unwanted physical contact.
- Making life deliberately difficult for an individual who has the potential to do the bully’s job better than the bully. It is the effect of the behaviour on the individual towards whom it is directed, not the intentions behind this behaviour, which determines whether it is bullying.
- Unwelcome remarks about a person’s age, dress, appearance, race or marital status, jokes at personal expense, offensive language, gossip, slander, sectarian songs and letters.
- Isolation or non-cooperation and exclusion from social activities
- Posters, graffiti, obscene gestures, flags, bunting and emblems.
- Personal insults.
- Persistent unwarranted criticism.
- Setting impossible deadlines.
- Shouting and bawling.
- Failure to safeguard confidential information.
- Personal intrusion from pestering, spying, and stalking.
- Pressure to participate in political/religious groups.
- Coercion for sexual favours.