



Document Title	Equal Opportunities & Dignity at Work Policy		
Document No.	LGL-HR-P-10		
Reference Document	HR		
Issue No. 1	Date: 19/07/2021	Page 1 of 5	

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Document No.	LGL-HR-P-10		
Reference Document	HR		
Issue No. 1	Date: 19/07/2021	Page 2 of 5	

Purpose

Lucy Group of Companies are committed to promoting equal opportunities in employment and to creating an environment free of unlawful discrimination, harassment and bullying

Scope

This policy applies to all UK employees of the Lucy Group of Companies ("Company").

The Company will avoid unlawful discrimination in 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.

This policy does not form part of any employee's contract of employment and it may be amended at any time

Policy

You must not unlawfully discriminate against, harass or bully other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts) and on work-related trips or events including social events.

Responsibilities

All managers must set an appropriate standard of behaviour, led by example and ensure that their reports adhere to the policy and promote the Lucy Group's aims and objectives with regards to equal opportunities and dignity at work. Managers and others involved in the recruitment process will be given appropriate training on equal opportunities and dignity at work. An act of discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

1. Equal Opportunities

1.1 The Lucy Group is committed to eliminating discrimination in employment. Our objective is to create a working environment in which there is no unlawful discrimination and all decisions are based on merit

1.2 It is unlawful to discriminate directly or indirectly in recruitment or employment because of a protected characteristic, namely:


- Age
- Disability
- Sex
- Gender reassignment
- Pregnancy and maternity
- Race (which includes colour, nationality and ethnic or national origins)
- Sexual orientation
- Religion or belief
- Marriage and civil partnership

1.3 Types of Discrimination

Direct Discrimination:

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees 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 job applicant or employee is associated and not on the job applicant's or

Document Title	Equal Opportunities & Dignity at Work Policy		
Document No.	LGL-HR-P-10		
Reference Document	HR		
Issue No. 1	Date: 19/07/2021	Page 3 of 5	

employee's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee 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.

The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment

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 when there is applied to the job applicant or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant's or employee's. A PCP is discriminatory in relation to a protected characteristic of the job applicant's 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 by the Company to be a proportionate means of achieving a legitimate aim

The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment

2. Dignity at Work

The Company 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.

2.1 Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, involving the misuse of power that can make a person feel vulnerable, upset, undermined, humiliated or threatened. Power does not always mean being in a position of authority but can include personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Examples of bullying would include:


- Physical or psychological threats
- Overbearing and intimidating levels of supervision
- Inappropriate derogatory remarks about someone's performance

Legitimate, reasonable and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to employees in the course of their employment, will not amount to bullying on their own.

2.2 Harassment

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Document Title	Equal Opportunities & Dignity at Work Policy		
Document No.	LGL-HR-P-10		
Reference Document	HR		
Issue No. 1	Date: 19/07/2021	Page 4 of 5	

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to a protected characteristic. Harassment is unacceptable even if it does not fall within any of these categories.

Examples of harassment include:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome
- unwelcome sexual advances or suggestive behaviour
- demeaning comments about a person's appearance
- jokes or comments of a sexual, racial, homophobic or ageist nature
- excluding an individual because he/she is associated or connected with someone with
- a protected characteristic, e.g. his/her child is gay, spouse is black or parent is disabled
- 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), e.g. an employee is thought to be Jewish, or is perceived to be a transsexual
- the use of obscene gestures
- sending or displaying material with sexual or offensive overtones, even if not directed at any particular person, e.g. magazines, calendars or pin-ups

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.

3. Recruitment and Selection

The Company aims to ensure that job requirements and job selection criteria are clear and based only on what is required to get the job done effectively.


- It will aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups and which are not justified by the demands of the job.
- For all jobs, a job description and person specification is produced detailing what the job involves and the skills, experience and qualifications which are relevant and necessary to do the job.
- Shortlisting for interview should be done using a pre-agreed marking system that is applied fairly and consistently to all applicants.
- Questions asked at interview should focus on whether someone has the relevant skills, qualities and experience to do the job. Applicants should not be asked questions that might suggest an intention to discriminate on grounds of a protected characteristic

4. Training and Promotion

Training and promotion decisions will be made on the basis of merit. The Company will not unlawfully discriminate against any employee in making promotion or training decisions. They believe all employees should have an equal opportunity to progress and develop.

5. Working Conditions and Terms of Employment

The Company aims to ensure that terms of employment, benefits, facilities and policies are free from unlawful discrimination and will try to accommodate religious practices where reasonably possible. A review of benefits and facilities will be conducted regularly to ensure that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them.

Document Title	Equal Opportunities & Dignity at Work Policy		
Document No.	LGL-HR-P-10		
Reference Document	HR		
Issue No. 1	Date: 19/07/2021	Page 5 of 5	

- Decisions made under the managing performance and grievance policies are carried out fairly and without discrimination.
- Each application for flexible working will be assessed on its individual merits, and in accordance with the Flexible Working Policy.
- Regular audit/reviews of pay structures will be conducted to ensure that they are fair and free from discrimination

6. Termination of Employment

A decision to dismiss an employee should be compliant with the relevant Lucy Group's policies.

Exit questionnaires should be carried out with all leavers to the extent reasonably possible to gain feedback on their views of working for the Lucy Group. Reasons for leaving should be collated and reported to management on a regular basis.

7. Disabilities

If you have a disability you are encouraged to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you can contact your line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

8. Reporting Complaints

All allegations of discrimination and bullying will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of unlawful discrimination from employees.

9. Monitoring and Review

The Company will regularly monitor the effects of selection decisions and personnel and pay 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 working practices. If changes are required, the Company will implement them. The Company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

Where do I go for more help?

- Line Manager
- HR

Change History

Date Created	Issue	Reason for Change
19/07/2021	1	Document Created