

Equal Opportunities Policy



1. Introduction

- 1.1. The Eat That Frog Group is committed to encouraging and achieving a working environment which is underpinned by fairness to all individuals, where equality and diversity is recognised, encouraged and valued, and the concept of individual responsibility is accepted by all.
- 1.2. The Eat That Frog Group expects all its employees to recognise their obligations to Equal Opportunities at all times and in accordance with Eat That Frog Group's ethos.

2. Purpose

- 2.1. This policy commits the Eat That Frog Group to being an equal opportunity employer and aims to set out the framework for a clear and consistent application of the equal opportunities legislation across the Eat That Frog Group.

3. Scope

- 3.1. This policy applies to all employees directly employed by the Eat That Frog Group.
- 3.2. This policy also applies to workers and volunteers, ie agency workers, consultants, contractors and casual workers

4. Responsibilities

- 4.1. The role of the Board of Directors is to ensure that agreed staffing policies and systems of infrastructure are in place and operating effectively to ensure that the legal requirements of the Company are met.

5. Policy Overview

- 5.1. This policy should be read in conjunction with Eat That Frog Group's policy on harassment and bullying, and grievance procedure.
- 5.2. All aspects of employment are covered by this policy. These include, but are not restricted to, the following:
 - pay and conditions of employment
 - training and continuing professional development
 - recruitment processes
 - promotion policies

Equal Opportunities Policy



- procedures for appraisals
- procedures for addressing grievances and disciplinary matters
- ending the employment contract
- providing outgoing employees with references
- how visitors are treated
- how clients and suppliers are treated
- how any other business contacts and associates are treated.

6. Our Equal Opportunities Commitment and Aims

- 6.1. We will not tolerate discrimination or harassment and are fully committed to promoting equal opportunities in employment. Our staff and anyone applying for a job within the Eat That Frog Group will receive fair and equal treatment.
- 6.2. We ensure full access to everyone applying for a vacancy, and decisions concerning transfers and internal promotions are made so far as possible using only objective criteria.
- 6.3. We will never victimise anyone who makes a legitimate complaint if they, or somebody else, is being harassed or discriminated against.
- 6.4. This policy is underpinned by the following further commitments and aims:
- a working environment free from all forms of unlawful discrimination, including victimisation and harassment
 - a workforce that is confident of being treated fairly and equally throughout the employment relationship
 - a workplace capable of allowing everyone to achieve their highest potential
 - a Company-wide understanding of the message promoted by this policy
 - a commitment to ensuring all staff understand their rights and responsibilities under the policy — if you are not sure what we consider acceptable and unacceptable, you should seek clarification from your manager.

Equal Opportunities Policy



- a policy of ensuring employment opportunities are open to all qualified candidates so that we recruit from the largest possible pool of available talent and recruit the best-qualified staff
- a commitment to creating a workforce based on ability that also mirrors the multicultural composition of the local community
- a commitment to regularly review this policy and our workplace practices to identify issues and eliminate any unlawful discrimination or other unacceptable behaviour we may find
- a commitment to protecting staff from being victimised or treated less fairly if they make a complaint in good faith under this policy.

6.5. Within our annual self-assessment of services, we will review our performance in relation to this policy and:

- deliver an equality action within the operational development plan to ensure that all commitments in this policy are fulfilled
- embed equality and diversity in to our business plan

7. Working with contractors, suppliers and partners

7.1. It is important to us that our suppliers, contractors and any other individual or organisation which we purchase supplies from, we partner or we sub-contract to, promote equality and value diversity.

7.2. For those which we subcontract we have an expectation that they will:

- share a copy of its Equal Opportunities Policy with us
- carry out equality monitoring for staff, board members/directors and customers as a minimum
- use the equality monitoring information gathered as a means of improving the representation of the workforce, management and customer base
- use accessible venues for events and meetings
- use accessible communications in everything that they do; For example, emails, letters, reports and publicity materials.

Equal Opportunities Policy



- ensure that all employment practices and procedures are fair
- provide evidence from time to time on the above points.

8. How We Define Discrimination

8.1. The following list gives you a general description of the types of acts that may both breach this policy and be unlawful. Sometimes actions can be intentional, and sometimes unintentional and we include examples of both types in this list:

- when somebody is treated less favourably because of a protected characteristic than somebody else has been — or would have been — in identical circumstances, then this is **direct discrimination**. Rejecting a job applicant because of their beliefs would, for example, amount to direct discrimination.
- when a group of people with one of the protected characteristics is put at a disadvantage by a provision, practice or criteria applied to all staff, this is **indirect discrimination**
- directly discriminating against someone because they associate with another person who possesses a protected characteristic is known as **associative discrimination**. For example, an employee may be overlooked for job promotion if the employer believes that they will not be able to dedicate time to their job if they are caring for a disabled dependant. This would amount to discrimination because of the employee's association with a disabled person.
- when a hostile, humiliating, degrading or similarly offensive environment is created in relation to a protected characteristic, this is **harassment**. We also consider it harassment for a worker to be subjected to uninvited conduct related to a protected characteristic that — as an intended or unintended consequence — violates their dignity. Name calling, lewd comments, excluding colleagues, making insensitive jokes, and displaying pornographic material are all examples of harassment. We deal in detail with harassment under our separate policy on harassment and bullying
- when a worker has complained about harassment or discrimination, or supported a colleague in their complaint, it is **victimisation** if they are then treated less favourably.

Equal Opportunities Policy



8.2. The 'protected characteristics' are:

- age
- race (which includes colour and ethnic/national origin)
- disability
- religion or belief
- gender
- gender reassignment
- pregnancy or maternity
- sexual orientation
- marital or civil partner status.

8.3. There are other actions which are illegal under the equal opportunities legislation, and these are collectively labelled **other acts**. Examples include:

- instructing another person — or applying pressure on them — to discriminate
- knowingly assisting somebody else when they carry out a discriminatory act
- discriminating against somebody believed to have a protected characteristic, whether or not they actually do, or because they associate with a third party who does.

8.4. There are practices which, although they appear to breach the aims of this policy, are in fact justifiable on objective and operational grounds. These are called **lawful practices**. If you are not sure whether some aspect of workplace behaviour you have experienced or witnessed is discriminatory or a lawful practice, please ask your manager for clarification.

9. How We Carry Out Our Responsibilities and Duties

9.1. Both management and staff are essential for ensuring the success of this policy and each has their own duties and responsibilities. We all have a legal responsibility to comply, and any of us — management and staff — may be found personally liable for unlawful discrimination if we breach the terms of the policy.

9.2. Overall responsibility for the effective implementation and operation of the policy lies with **management**, specifically with **the Board of Directors**. Everyone working at managerial level is expected to act in full accordance with this policy, lead by example,

Equal Opportunities Policy



and attain and maintain appropriate standards of behaviour within the teams they manage.

- 9.3. The ethos and standard covered by this policy can only be achieved and maintained if **all staff** also co-operate fully, and it is important to understand that you also have a legal responsibility to comply. If you breach this policy, you may also make the Eat That Frog Group liable for your actions and both of us may have to pay compensation to anyone who claims against us. We accordingly expect you to take personal responsibility for adhering to the policy's aims and commitments and for drawing any breaches to our attention.
- 9.4. We also encourage all staff to take part in promoting equal opportunities across the Eat That Frog Group. Please contact your Manager if you have any ideas about how we could do this better.

10. How We Recruit, Promote, and Make Other Selections

- 10.1. We carry out all recruitment, promotion and other types of selection procedures — such as for redundancy exercises — on the basis of merit using non-discriminatory and, as far as possible, objective criteria.
- 10.2. Advertisements for vacancies must not include wording that may discourage some groups of people from applying, or stereotype in any way, and they must be placed where they can reach as wide and diverse a pool of potential candidates as possible.
- 10.3. Nobody applying for employment within the Eat That Frog Group must be asked about their health or whether they have a disability before a job offer is made, except in very limited situations. It may, for example, be justifiable to ask whether the applicant needs any disability-related measures put in place for the interview, or to check that they are capable of carrying out a key part of the job. It is acceptable to make some job offers dependent on a medical examination.
- 10.4. It is unlawful to ask job applicants anything that might suggest intent to discriminate on the grounds of a protected characteristic. Asking an applicant about their religion for a job entailing weekend working would not, for example, be permissible.
- 10.5. Including health or disability questions in equal opportunities monitoring exercises is acceptable, but the data gathered must not be used for selecting or other employment-related decisions.

Equal Opportunities Policy



11. How We Enforce This Policy and Handle Breaches

- 11.1. We investigate any complaint or allegation you raise regarding a potential breach of this policy, and if you believe you have been harassed or discriminated against you should contact your Manager as soon as possible. If you want to take formal action, you will need to follow our grievance procedure and read our policy on harassment and bullying.
- 11.2. You will face disciplinary action if we find you have harassed or discriminated against anyone else in breach of this policy. Sometimes this type of behaviour may amount to gross misconduct, in which case you will be dismissed without notice and with no payment in lieu of notice.
- 11.3. Most concerns are raised in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. This is classed as a vexatious claim. Anyone found doing this will face action under our Disciplinary Policy and may be dismissed for misconduct, or even gross misconduct.

12. How We Monitor Whether the Policy is Working

- 12.1. We may record and analyse information about equal opportunities within the workplace, and when you join the Eat That Frog Group we will ask for your consent to gather and process this data about you. We will use the information to make sure this policy is operating properly and refine it, to review the composition of the workforce, and to promote workplace equality.

13. Review

- 13.1. This policy does not form part of an employee's contract of employment and the Company may amend it at any time.
- 13.2. This policy reflects current statutory legislation at the time of writing. Any changes to statutory legislation will take precedence.

Equal Opportunities Policy



13.3. History of Policy Changes

Date	Page	Details of the change	Agreed by
11.06.18	All	New Policy – replaces Equality & Diversity Policy	Board Meeting