



## **Equality and Diversity Policy**

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## INTRODUCTION:

Prestige Network is committed to ensuring equality of opportunity in all of its activities and as an employer we value diversity within our workforce. We expect all employees to show respect for others irrespective of their culture, backgrounds, age or any other protected characteristic.

**Equality** is giving everyone an equal chance to fulfil their potential and providing equality of opportunity, equal access to services and fair and proportional treatment.

**Diversity** respects and values everyone's differences. Treating everyone as an individual means appreciating an individual's skills, ideas, perspectives and experiences, and meeting their needs.

We provide equality of opportunity and deliver services in line with legislation and will not tolerate discrimination on grounds of:

- Age
- Disability
- Sex
- Sexual orientation
- Gender reassignment
- Race
- Religion or belief
- Pregnancy and Maternity
- Marriage and Civil Partnership

Our equality and diversity aims are to:

- Provide the best possible services we can that are accessible to all, delivered in a way that respects the differing needs of the individual.
- Employ individuals who are motivated because they feel valued for the contributions they make and the diversity they bring.
- Promote equality of opportunity and diversity within our workforce and with our partners.
- Ensure our values are embedded into all policies and procedures and everyday practices.
- Ensure any breach of our equalities and diversity policy is regarded as misconduct and as such, investigated fairly under our disciplinary procedure.

Every person working for Prestige Network has a personal responsibility for implementing and promoting our values in their day-to-day dealings with clients, with each other and with partners.

To ensure that this policy is operating effectively, Prestige Network maintains records of employees' and applicants' racial origins, gender and disability.

Ongoing monitoring and regular analysis of such records provide the basis for appropriate action to eliminate unlawful direct and indirect discrimination and promote equality of opportunity.

We will measure the effectiveness of our service delivery and employee policies and processes and use this to inform future policy and to enhance business processes.

**SIGNED:** .....

**DATE:** 19<sup>th</sup> November 2016

**NAME:** Shawn Khorassani

**NEXT REVIEW:** 19<sup>th</sup> November 2017

### Responsibilities

The responsibility for ensuring there is no unlawful discrimination rests with all staff.

Shawn Khorassani, Director has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. He has day-to-day operational responsibility including review and revision. A copy of this policy is available on our company website; all linguists are directed to this policy as part of their application process.

All managers expected to conduct themselves in a professional manner and set an appropriate standard of behavior. They should lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equality and diversity. Managers should reward and challenge appropriately and fairly. Managers will be given appropriate training on equality and diversity awareness, and equal opportunities recruitment and selection best practice.

Employees are expected to conduct themselves in a professional manner, interacting with colleagues, customers and clients appropriately and fairly at all times. Employees must ensure they comply with all company policies and procedures including but not limited to our equalities and diversity Policy. All staff will be given access to a copy of this policy as part of formal induction.

Prestige Network aims to provide a working environment that respects the rights of others. Any behavior that undermines this is unacceptable. We are committed to ensuring that everyone is able to work or access our services without fear of discrimination, harassment, bullying or intimidation.

### Discrimination

You must not unlawfully discriminate against or harass 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 events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

**Direct discrimination:** treating someone less favourably because of a Protected Characteristic; for example, rejecting a job applicant because of their religious views or because they might be homosexual.

**Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified: For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

**Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

**Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

**Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

### Recruitment and selection

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person where possible. Our recruitment procedures are documented and reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

**Vacancy advertising:** Wherever possible, all vacancies will be advertised simultaneously internally and externally. Steps will be taken to advertise to a diverse section of the labour market and ensure that knowledge of vacancies reaches under-represented groups internally and externally.

Wherever possible, vacancies will be notified to job centres, careers offices, schools, colleges, universities, etc., with significant minority group rolls, as well as to minority press/media and organisations.

All vacancy advertisements will avoid stereotyping or using wording that may discourage particular groups from applying, and will include an appropriate short statement on equal opportunity.

**Interview and selection:** Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

Wherever possible, more than one person must be involved in the selection interview and recruitment process, and all should have received training in equal opportunities.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic; for example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions for example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Wherever possible, women, minorities and disabled persons will be involved in the short listing and interviewing processes. Reasons for selection and rejection of applicants for vacancies must be recorded.

**Entitlement to work in the UK:** Prestige Network are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. We follow the list of acceptable documents as laid down by the UK Border Agency.

**Monitoring:** To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure.

Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

As detailed below we also record sick absences, discipline/grievances, hours that staff work, rates of pay and training received. Such records will be analysed regularly and appropriate follow-up action taken.

If necessary, where data suggests, equality impact assessments will be carried out to ascertain the effects on our workforce, customers or the service that we provide and appropriate action plans put in place to address the issue.

### **Positive Action -Training, promotion and conditions of service**

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all employees and that there are no unlawful obstacles or unjustifiable barriers to access. Where necessary, we provide appropriate facilities and conditions of service to meet the needs of disadvantaged and/or underrepresented groups.

Training needs will be identified through regular appraisals. All staff will be given appropriate access to training to enable progress within the organisation and all promotion decisions will be made on the basis of merit.

Under-represented groups will be encouraged to apply for training and employment opportunities with the company.

Wherever possible, special training will be provided for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, actual recruitment to all jobs will be strictly on merit. Wherever necessary, use will be made of lawful exemptions to recruit suitably qualified people to cater for the special needs of particular groups.

Opportunities for promotion and training are made known to all staff and are available on a fair and equal basis.

### **Disabilities**

As a company we place particular importance on the needs of disabled people. We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. All reasonable and necessary adjustments will be investigated and any justified changes will be made to the workplace and to employment arrangements so that disabled people are not at any substantial disadvantage compared to non-disabled people. This covers all areas of employment, including recruitment, promotion and training.

During recruitment and selection, we will modify selection techniques, where appropriate, and make any other reasonable changes to ensure that disabled people can be considered equally with non-disabled candidates

We ensure that disabled people receive equal treatment in training and development, and, where appropriate, supply additional training.

If you are a staff member who is or becomes disabled, we encourage you 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 may wish to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and adopt a flexible approach in reaching a decision. Where possible and justified, consideration to reallocation of duties, time off for rehabilitation, assessment or treatment or other appropriate measures to ensure equal opportunity. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

### **Flexible, Part-time and fixed-term work**

Prestige Network has adopted a flexible approach to working arrangements. We will consider all requests to work flexibly and for time off for family or religious needs. We also accommodate religious or cultural dress codes.

Part-time and fixed-term staff are treated the same as comparable full-time or permanent staff and enjoy no less favorable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

### **Equal Pay**

Prestige Network strives to ensure that women and men employees are receiving equal pay if they are employed to do work which is similar, rated as equivalent, through job evaluation and is of equal value in the demands made of them.

### **Termination of employment**

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

### **Harassment and bullying**

Prestige Network does not tolerate any form of harassment or bullying. We will take action against inappropriate behaviour which shows a lack of respect for others and leads to people feeling threatened, bullied or harassed. This applies to work related functions which are held outside of normal working hours, either on or off the company premises, such as Christmas parties, leaving celebrations and working lunches, etc.

Harassment is 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 working environment for them.

Workplace bullying can vary from extreme forms such as violence and intimidation to less obvious actions, like deliberately ignoring someone at work.

Employees who believe they are being harassed or bullied should report this to their line manager. Each report of harassment or bullying will be properly investigated and appropriate action taken

using the company's grievance and disciplinary procedure. The procedure may be adapted to take account of the sensitivities of such situations.

### **Discipline and grievance**

Prestige Network has adopted procedures for handling discipline and grievance that apply to all staff. Every effort is made to apply these procedures and any sanctions fairly and consistently regardless of race, sex, disability or any other protected characteristic.

### **Maternity, paternity, adoption and shared parental leave.**

When an employee becomes pregnant, Prestige Network allows her to take paid time off for antenatal care. The company provides additional health and safety protection for an expectant mother and for her unborn child. Prestige Network allows her to return to her job after a period of maternity leave.

In addition Prestige Network will avoid any unlawful discrimination against any employee requesting leave in relation to Paternity, Adoption or shared parental leave, as detailed in the Maternity, Paternity, Adoption and Shared parental leave Policy.

### **Personnel records**

In order to ensure the effective operation of the equal opportunity policy (and for no other purpose) a record will be kept of all employees' and job applicants' gender, racial origins and disability.

Records are also kept on sick leave/absences and reasons, discipline/grievances, hours that staff work, rates of pay and training received.

Where necessary, employees will be able to check/correct their own record of these details. Otherwise, access to this information will be strictly restricted and kept as confidential.

Such records will be analysed regularly and appropriate follow-up action taken.

### **Breaches of this policy**

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure as appropriate. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.