

Stelrad Limited Stelrad House, Marriott Road Mexborough, South Yorkshire S64 8BN

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STELRAD LIMITED

EQUAL OPPORTUNITIES POLICY 2011



EQUAL OPPORTUNITIES POLICY

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1. Scope of the policy

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify employees in writing of any changes. This policy applies to all employees, contractors and job applicants.

This policy is effective from 1 March 2011.

2. Aims

The Company is a committed Equal Opportunities employer. We want to ensure the workplace is a non-discriminatory working environment and that advancement within the Company is on the basis of ability, performance and aptitude for work.

The Company will ensure that there are Equal Opportunities in recruitment and pre-recruitment initiatives, selection, induction, employment contracts, collective agreements with trade unions, pay, benefits, performance reviews, training, redundancy and all other aspects of employment within the Company.

Discrimination on the grounds of actual or perceived, age, sex, sexual orientation, race, disability and religion or belief will not be tolerated.

Any incidents of discrimination contrary to the principles of Equal Opportunities will be treated as a serious disciplinary matter.

3. Principles

There will be no discrimination on account of:-

- Age
- Race
- Colour
- Religion or Belief
- Ethnic Origin
- Sexual Orientation
- Gender
- Disability
- Nationality
- Martial status
- Part-Time status
- Fixed term status [in line with the Fixed Term Workers Regulations]

The Company will appoint, train, develop, reward and promote on the basis of merit and ability.

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, contractors, customers and visitors.

Special responsibility for the practical application of the Company's Equal Opportunities fall upon Managers, Supervisors and Human Resources involved in recruitment, selection, promotion and training of employees.



The Company's grievance procedure is available to any employee who believes that he or she may have been unfairly discriminated against. Employees will not be victimised in anyway for making such a complaint in good faith.

Complaints of this nature will be dealt with seriously, in confidence and as soon as reasonably practical.

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 will be treated as gross misconduct.

Allegations of discrimination that 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.

In the case of any doubt or concern about the application of this policy in any particular instance, consult Human Resources.

The Company will keep under review its policy, procedures and practices on Equal Opportunities.

4. Objectives

The Company will ensure that equality of opportunity is maintained in the following areas.

- Recruitment and Selection.
- Promotion, Transfer and Training.
- Terms of Employment, Benefits, Facilities and Services.
- Grievances and Disciplinary Procedures.
- Dismissals and Redundancies.

4.1 Recruitment and Selection

The following principles will apply whenever recruitment or selection for positions takes place:

- Individuals will be assessed according to their personal capabilities to carry out a given role.
- Assumptions that only certain types of person will be able to perform certain types of work will 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 person will only be retained if they can be justified in terms of the job to be done.
- Any age limits applied to a job will 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 person from applying.
- Selection tests will be specifically related to job requirements and will measure the person's actual or inherent ability to do or train for the work.
- All applications from different types of person will be processed in the same way.
- Written records of interviews and reasons for appointment and non appointment will wherever possible be made and kept.
- Questions will relate to the requirements of the job, if it is necessary to assess whether personal circumstances may affect the job performance, this will be done objectively without questions or assumptions being made which are based on stereotyped beliefs about certain types of person.



- Where the Company's arrangement for recruitment and selection put disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements will be made to eliminate, or if not reasonably practical reduce the disadvantage unless objectively justified.
- No decisions regarding recruitment or selection will be made by a person who has not read and understood this policy.

4.2 Promotion, Transfer and Training

The following principles will apply to appointments for promotion, transfer and training:

- Assessment criteria and appraisal schemes will be carefully examined to ensure that they are not unlawfully discriminatory.
- Promotion and career development patterns will be monitored to ensure that access to promotion and career development opportunities do not unjustifiably exclude any particular groups of individuals.
- 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, reduce the disadvantage unless objectively justified.
- Training needs will be identified through appraisal discussions.

4.3 Terms of Employment, Benefits, Facilities and Services

The following principles shall apply to the terms of employment, benefits, facilities and services:-

- The terms of employment, benefits, facilities and services available to workers will be free from unlawful discrimination.
- Part time workers will receive pay, benefits, facilities and services on a pro rata basis to their full time comparator unless otherwise objectively justified.
- Fixed term workers will receive pay, benefits, facilities and services on an equal basis where practical to their permanent comparator unless otherwise objectively justified.
- Where the Company's arrangements relating to terms or employment, benefits, facilities and services put disabled workers at a substantial disadvantage due to the reason connected with their disability, reasonable adjustments will be made to eliminate or where that is not reasonably practical, 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 it is not due to any hidden or indirect discrimination.

4.4 Grievances, Disciplinary Procedures, Dismissals and Redundancies

Workers who, in good faith, bring a grievance (or assist another to do so) either under this policy or otherwise in relation to an Equal Opportunities matter will not be disciplined, dismissed or otherwise victimised for having done so.

Redundancy criteria and procedure will be carefully examined to ensure that they do not operate in an unlawfully discriminatory manner.



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5. Our relationships with visitors/customers/suppliers

Employees must not discriminate against any of our visitors/customers/suppliers. Equally, we expect our visitors/customers/suppliers not to discriminate against our employees and we will take appropriate action against any visitor/customer/supplier found to have done so.

6. Disabilities

It is Company policy that disabled people, including job applicants and employees should be able to participate in all of the Company's activities fully on an equal basis with people who are not disabled.

6.1 Definition of Disability

For the purpose of this policy, disabilities are either physical or mental impairments that have a substantial and long term affect upon a person's ability to carry out normal day-to-day activities as per the definition in the Disability Discrimination Act 1995.

Some disabilities are immediately obvious, for example use of a wheelchair, while other disabilities may not be so apparent at all, for example HIV infection. Certain conditions are not considered to be disabilities, for example poor eyesight which is corrected simply by wearing prescription spectacles, or an addiction to alcohol or other substances. If you would like further information about whether a particular condition is a disability you should contact the HR Department.

Normal day-to-day activities are any of the following:

- Mobility.
- Manual dexterity.
- Physical coordination.
- Continence.
- Ability to lift, carry or otherwise move everyday objects.
- Speech, hearing or eyesight.
- Memory or ability to concentrate, learn or understand.
- Perception of risk of physical danger.

6.2 Principles

The general Equal Opportunities principles set out earlier in this policy will, unless objectively justified, apply in relation to disabled people.

The Company will take all reasonably practical steps to ensure that disabled people are able to participate in its business and activities on an equal basis with people who are not disabled.

The Company will not, for a reason relating to a person's disability, treat disabled people less favourably than it treats, or would treat, others to whom the same reason does not or would not apply, unless genuinely justified.

If any arrangements made by or on behalf of the Company, or any physical feature of the premises occupied by the Company, put disabled people at a substantial disadvantage compared to people who are not disabled, the Company will take such reasonably practical steps as it can to prevent this disadvantage.



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The Company is particularly concerned that disabled workers are treated equally in the following areas:

- Recruitment and selection.
- Promotion, transfer and training.
- Terms of employment, benefits, facilities and services.
- Dismissals and redundancies.

7. Policy review and promotion

The Policy will be reviewed and updated periodically in line with changing legislation and procedure.

We will promote and publicise our Equality Policy in application packs, induction packs, noticeboards and handbook.