



RICHARD GLEN ASSOCIATES


EQUAL OPPORTUNITIES POLICY

1.0 Introduction

The following sections describe our policy on equal opportunities.

2.0 Equal Opportunities

The Practice is an equal opportunities employer. All employees and other individuals will receive equal treatment regardless of age, sex, sexual orientation, race, religion or belief, disability or a condition arising from disability, marital status (including marriage and civil partnership), gender reassignment and pregnancy and maternity. These are known as 'protected characteristics.'




The Practice will also treat employees equally regardless of their employment status, whether full-time, part-time or fixed-term, and regardless of their parental or dependent responsibilities.

The Practice will endeavour to make full use of the skills and resources of its entire workforce and ensure that all employees are treated with dignity and respect, are not harassed, victimised or unlawfully discriminated against.

3.0 Disabilities

The Practice is an equal opportunities employer and will take reasonable steps to ensure that persons are not substantially disadvantaged in any of our practices due to their disability, or to a condition arising from their disability.

Full support will be given to any employee who is or becomes disabled. The Practice will endeavour to keep them in their own role wherever possible by making reasonable adjustments. If this is not possible then the Company will look at redeploying them into a suitable role.



Employees with disabilities will be consulted to ensure that the Practice is meeting their needs and discuss any actions or reasonable adjustments that may necessary to ensure they are not disadvantaged.

4.1 Recruitment and Selection

All recruitment publicity aims to encourage applicants who have appropriate skills, qualifications and/or experience.

If there is a genuine and lawful reason why only one group of people would be eligible for this position, the reasons will be stated in any recruitment publicity; however these are likely to be on a very limited basis.

Objective criteria will only be used on job and person specifications for the tasks and responsibilities of a role. All candidates are assessed and selected according to their skills and ability to carry out the role for which they have applied. The selection criteria and processes will be continually reviewed to ensure compliance to equal opportunities and the relevant legislation.



Reasonable adjustments will be made for candidates with a disability to ensure they are not disadvantaged in the recruitment and selection process.

4.2 Personnel Security in Recruitment

Job advertisements for vacancies should state that the position is subject to background checking or alternatively applicants must be informed prior to interview. Applicants should be informed that their assistance in obtaining background information on themselves is expected and that they will be asked to sign a statement authorising an approach to previous employers, personal referees, etc.

Any background 'discrepancy' is to be resolved before the offer of employment is confirmed. Applications for employment will be rejected if, as a result of the screening process, the candidate is deemed to be unsuitable. All applicants are to be informed that supplying false information or failing to disclose material information may prove grounds for disciplinary action leading up to dismissal and/or legal action.

4.3 Pre-Employment

An interview should be carried out as:

- They encourage applicants to be honest.
- They allow for more information to be assessed regarding the candidate.
- They provide an opportunity for a face to face assessment of the applicant's reliability and integrity.
- They provide an opportunity for face to face verification of identity.

Background checking information forms should be sent to each candidate prior to interview. During the interview process, the interviewer must ask for the return of the background checking form and ask candidates to confirm their full name and date of birth with a supporting document, either a full current passport or British photo driving licence. This is to verify the documents sent for background checking purposes belong to the person at interview.

Background Checking.com will carry out the background checks (www.backgroundchecking.com) on behalf of the Practice. They will return a report highlighting any issues.

The importance of personnel security requires that employment should not commence until satisfactory employment screening is completed except in exceptional circumstances. Where there is a business need for an employee to commence work prior to the completion of satisfactory screening a risk assessment must be conducted. The risk assessment will consider the role, the business need, the level of outstanding information, the reason for any delay and identify any additional controls required until satisfactory checking is complete. Authorisation shall not be given where the role is such that it has a significant level of responsibility or access to sensitive sites, systems or information and as such poses an unacceptable risk.



4.4 Background Checks Required

The range of background checks can be quite extensive. The type of role that the individual will undertake and the level of site, system and information they will have access to needs to be considered.

4.5 The Minimum Requirement

The following constitutes the minimum acceptable standard for background checking individuals prior to employment by the Practice and will comply with the British Standard 7858: 2006.

- ID Check
- Right to Work in the UK
- Address verification for previous 5 years
- Finance Checks – County Court Judgement, Insolvency & Bankruptcy search
- Written employment verification for previous 5 years
- Basic Disclosure - Criminal Record Check
- Qualifications / Professional Memberships (Visual Check)
- Driving Licence (if held)



4.6 Other Checks Available

The Practice Manager will determine whether additional background checks are appropriate based on the risk associated with the role. Considerations should include:

- A heightened security requirement (MOD, Intelligence, Police, Nuclear or School projects).
- The responsibilities and type of job warrant a more robust screening than the standard checks if the role is based at a high security location or will enable access to highly sensitive or critical information or systems.



Local requirements may also be mandated or considered best practice for certain roles or locations, or after advice from government agencies.

- Verification of qualifications and professional memberships
- Extended address verification up to 10 years
- Extended employment verification & references up to 10 years and employment gap checks
- Government Security checks 'Security Vetting'
- Fraudulent Passport Check



For some posts of significant financial or commercial responsibility the following may also be appropriate:

- Media archive checks
- Property ownership search
- Directorship search including for any disqualifications or prohibitions
- Company search for non declared links
- Standard CRB Disclosure (Criminal) – When permitted under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. This will identify all convictions including those considered 'spent' under the Rehabilitation of Offenders Act 1974.

4.7 Training / Personal Development

All employees will be given equal consideration for training and personal development as required for their role. All selection for training programmes will be based on the need for the skills for the employee to carry out their role. Reasonable adjustments (where required) will be made for employees to ensure they are able to fully access training opportunities.

4.8 Career Development

All employees will have the equal opportunity to develop their career and any promotion decisions will be made according to an employee's skills and ability to carry out the role.

Reasonable adjustments (where required) will be made for employees with a disability to enable them to carry out the role.

4.9 Terms and Conditions of Employment

The Practice will ensure that all terms and conditions are free from all forms of discrimination, supports the principle of equal pay for men and women and is committed to sustaining pay systems, which are free from sex bias.

5.0 Employee and Manager Responsibilities

All employees must ensure that their behaviour and conduct is non-discriminatory and that they help towards an environment that is free from harassment and victimisation.

Any employee found to be in breach of this policy would be subject to disciplinary procedures. Serious breaches, such as bullying and/or harassment, will be treated as Gross Misconduct.

The Practice Manager is responsible for implementing this policy and ensuring any problems are dealt with promptly and in a fair and consistent manner. Any complaints received must be thoroughly investigated.



6.0 Grievance Process

An employee who feels they have been discriminated against or disadvantaged should follow the grievance procedure and contact the Practice Manager with clear written details of the grievance and why they feel that they have been treated in breach of the policy.

All grievances will be carried out in the strictest confidence and will not prejudice the employee's future in any way.

7.0 Freedom of Association and the Right to Collective Bargaining

- Employees, without distinction, have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively.
- The Practice adopts an open attitude towards the activities of trade unions and their organisational activities.

Employee representatives are not discriminated against and have access to carry out their representative functions in the workplace.

8.0 Monitor and Review

The Practice Managers will be responsible for ensuring that this policy is properly administered and that the Practice complies with the Regulations as outlined above.

This policy will be reviewed on an ongoing basis, and in line with any amendments to current legislation.

9.0 Legislation

This policy is covered by the following legislation and will be reviewed and updated with the implementation of new and changes in legislation:

- Equality Act 2010
- Equal Pay Act 1970
- Employment Rights Act 1996
- Employment Act 2002
- Race Relations Act 1976 & Amendment 2000
- Disability Discrimination Act 1975
- Sex Discrimination Act 1975
- Employment Equality Regulations 2003



10.0 Definitions

Discrimination is defined as less favourable and detrimental treatment that is related to age, sex, sexual orientation, race, religion or belief, disability or a condition arising from disability, marital status (including marriage and civil partnership), gender reassignment and pregnancy and maternity. Discrimination can be made on the basis of one or even two protected characteristics.

10.1 Direct Discrimination

Direct discrimination occurs when somebody has been treated less favourably in relation to their or another person's sex or sexual orientation, age, race, religion or belief, disability or a condition arising from disability, marital status (including marriage and civil partnership), gender reassignment and pregnancy and maternity.

10.2 Indirect Discrimination

Indirect discrimination occurs when a provision, criterion or practice is applied equally but it has a detrimental affect on a number of the workforce because they cannot comply with the provision, criterion or practice or the provision, criterion or practice cannot be justified.

10.3 Victimisation

Victimisation occurs when a person is treated less favourably because they have made allegations, initiated the grievance process, or given evidence regarding the behavior of someone who has being discriminating or harassing them or another employee.

10.4 Harassment

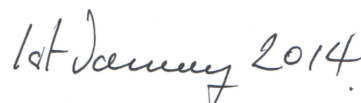
Harassment is a form of direct discrimination. (See Harassment & Bullying Policy). Harassment is defined as 'where an individual engages in unwanted conduct related to a relevant protected characteristic, whether actual, perceived or associative, that has the purpose or effect of violating another individual's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.'

10.5 Employment Screening

In order to safeguard our personnel, commercial interests and legal obligations it is essential that appropriate and satisfactory pre-employment screening is completed in respect of new employees prior to taking up employment. The purpose of screening is to verify the credentials of the employee and to check that the individual meets the preconditions of employment. We must ensure that all new employees are entitled to work in the UK and to guard against the employment of anyone who poses an unacceptable risk to our business. By performing background checks as part of the employment screening process it should be established whether an applicant has concealed important information or otherwise misrepresented themselves.



Richard Glen
On behalf of Richard Glen Associates



Date