

## 1. About this policy

- 1.1. The company's Equality and Diversity Policy applies to all staff and management. Clipfine Limited acknowledges the desirability of equal opportunities for employment and the observance of the codes of practice as far as it is reasonably practicable. Also we are fully aware and compliant with the requirements of the Equality Act 2010. This Act harmonises and strengthens discrimination law to support the progress of equality. This Act includes information on socio-economic inequalities, key concepts of equality, and prohibits discrimination, harassment and victimization at work. This Policy provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society
- 1.2. The Equality and Diversity Statement set out below is provided within the company employment information binder (Handbook) on employment.
- 1.3. The rationale for the company's commitment to equality and diversity includes:
  - An understanding of the importance of accessibility to all sections of the community.
  - Identifying and developing the skills and talents offered by members and potential members of the organisation.
  - The awareness that discrimination is illegal, immoral, and wasteful.
  - The recognition of the negative impact on individuals of the effects of discrimination in terms of educational attainment, career progression, self-fulfillment and self-esteem.
- 1.4. Equal opportunities in all aspects of our employment policy and practice are a core value and cover everybody in our Company. This means that we shall not discriminate in any way (either directly or indirectly) against any individual. Any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).
- 1.5. We believe that diversity is an essential ingredient of the Company culture and that the composition of our employees should ideally reflect that of today's society.
- 1.6. We expect our employees to ensure that they promote this approach in all aspects of their dealings with people. We would particularly stress the importance of fair selection, training and promotion procedures and we shall consistently review our procedures to ensure that they comply with best practice. The Company will regularly monitor its recruitment and promotion decisions in conjunction with ethnic records of job applicants and existing employees' disability.
- 1.7. This policy applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 1.8. [POSITION] is responsible for this policy and any necessary training on equal opportunities.

## 2. Discrimination

- 2.1. Employees 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 trips or events including social events.

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

2.2.1. 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 gay.

2.2.2. 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.

2.2.3. 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. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

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

2.2.5. 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.

### 3. Recruitment and selection

3.1. 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 if possible.

3.2. Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

3.3. 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.

3.4. Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

### 4. Disabilities

4.1. If an employee is disabled or become disabled, we encourage them to tell us about their condition so that we can consider what reasonable adjustments or support may be appropriate. We will make every reasonable effort to continue to provide suitable employment.

## 5. Part-time and fixed-term work

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

## 6. Breaches of this policy

5.1. Clipfine takes 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.

5.2. If an employee believes that they have suffered discrimination they can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.

5.3. Employees must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

This policy applies to all employees of Clipfine Limited.

Date: November 2018

Signed:



T. MacCarron  
Chairman

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