

## Equal Opportunities Policy

Proactive people management is an important part of continuous improvement for Babington and its employees. Maintaining and improving standards of conduct, behaviour and individual contribution through effective conversations and continuous feedback is key in our future success.

Babington is committed to promoting equality and diversity and promoting a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work. We aim to be an inclusive organisation, committed to providing equal opportunities throughout employment including in the recruitment, training and development of employees, and to pro-actively tackling and eliminating discrimination.

### Introduction

At Babington, we consider that equality means breaking down barriers, eliminating discrimination and ensuring equal opportunities and access for all groups both in employment, and in the services we offer.

We consider diversity to mean celebrating difference and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but also for Babington.

We acknowledge that equality and diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed.

### Scope

This policy and procedure applies to all Babington employees.

### Key Principles

Every employee is entitled to a working environment that promotes dignity, equality and respect for all. The Company will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, contractor, job applicant or visitor because of a protected characteristic:

- sex;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race (including ethnic origin, colour, nationality and national origin);
- disability;
- sexual orientation;
- religion and or belief; and
- age

All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities in Babington. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

No form of intimidation, bullying or harassment will be tolerated.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. The Company will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under our disciplinary policy.

Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination. Serious breaches of this equal opportunities policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should bear in mind that they can be held personally liable for any act of unlawful discrimination.

## Responsibilities

### Managers

- Promoting a culture free from illegal discrimination and all forms of harassment and bullying.
- Ensuring that their behaviour and/or actions do not amount to discrimination or harassment in any way.
- Consulting with the People and Talent team for advice and assistance as required
- Adhering to this policy

### People and Talent Team

- Promoting a culture free from illegal discrimination and all forms of harassment and bullying.
- Ensuring that their behaviour and/or actions do not amount to discrimination or harassment in any way.
- Providing advice to managers and employees in relation to our commitment to equality of opportunity

### Employees

- Promoting a culture free from illegal discrimination and all forms of harassment and bullying.
- Drawing the attention of line management or People & Talent team to suspected discriminatory acts or practices.
- Ensuring that their behaviour and/or actions do not amount to discrimination or harassment in any way.
- Adhering to this policy

## Implementation of this policy

### Recruitment, advertising and selection

The Company is committed to applying its equal opportunities principles at all stages of recruitment and selection. The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, Babington will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

Where a vacancy could be filled by an internal candidate, it will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic. However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Company will apply that requirement to the job role and this may therefore be specified in the advertisement.

The selection process will be carried out consistently for all jobs at all levels. The staff responsible for the short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Person specifications and job descriptions will be limited to these requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

### Training and promotion

Line managers will be responsible for ensuring they actively promote equality of opportunity within the departments for which they are responsible.

Processes for advancement and training within the Company must not be discriminatory, and will be checked from time to time to assess how they are working in practice. If a group of employees who predominantly have a particular protected characteristic appear to be excluded from access to promotions, transfer and training (as well as other benefits), processes will be reviewed to ensure there is no unlawful discrimination.

#### Terms of employment, benefits, facilities and services

All terms of employment, benefits, facilities and services will be reviewed from time to time, in order to ensure that there is no unlawful direct and indirect discrimination relating to any protected characteristic.

#### Reporting complaints

All allegations of discrimination will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat grievances or complaints of unlawful discrimination lightly.

If an employee wishes to make a complaint of discrimination, they should speak to their line manager or a member of the People & Talent team.

#### Monitoring equal opportunity

Babington will establish appropriate information and monitoring systems to assist the effective implementation of our Equal Opportunities Policy.

The effectiveness of this policy will be reviewed on a regular basis in consultation with stakeholders and action taken as necessary.

## **APPENDIX 1: Types of discrimination**

The main types of discrimination are:

### Direct discrimination

Direct discrimination occurs where one person is treated less favourably than another because of a protected characteristic set out in this policy. By way of example, refusing to promote a pregnant employee on the basis that she is shortly due to go on maternity leave would be direct discrimination on the protected characteristic of the employee's sex.

Other types of direct discrimination are:

- Associative discrimination - this is direct discrimination against someone because they associate with another person who possesses a protected characteristic. For example, an employee is discriminated against because his/her son is disabled.
- Perceptive discrimination - this is direct discrimination against an individual because others think they possess a particular protected characteristic. For example, where co-workers believe the individual is gay. It applies even if the person does not actually possess that characteristic.

### Indirect discrimination

Indirect discrimination occurs when an unjustifiable requirement or condition is applied, which appears to be the same for all, but which has a disproportionate, adverse effect on one group of people. This is discrimination even though there was no intention to discriminate. For example, a requirement for UK based qualifications could disadvantage applicants who have obtained their qualifications outside of the UK; this could amount to indirect discrimination on the grounds of race.

### Victimisation

Victimisation is where an employee is treated less favourably than others because they have asserted legal rights against Monitor or assisted a colleague in doing so. For example, victimisation may occur where an employee has raised a genuine grievance against Monitor and is demoted as a result.

### Harassment

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 environment for that individual.” It is important to remember that it is not the intention of the harasser but how the recipient perceives their behaviour, which determines whether harassment has occurred.

This document is issued on a version controlled basis and is available to all colleagues on the corporate intranet

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**Change History Record**

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