



Equality and diversity policy

April 2019

Purpose and scope

The purpose of this Equality and Diversity Policy is to communicate our commitment to equality of opportunity in employment, with the aims of ensuring that all employees and job applicants are treated fairly and equally, and supporting the Company's objective of providing a working environment that is free from all forms of discrimination.

The policy applies to all staff within the Company, including employees and other workers, such as agency workers, temporary workers and contractors. All staff are expected to put this policy into practice.

A copy of this policy is available to all employees and can be found on our internal server and in the Employee Handbook and will be made available to new employees upon their engagement. Job seekers and applicants can access this policy via Copper's website, and will be sent a copy of the policy on request. In addition, all employees receive a briefing on this policy and the induction process for new employees includes a briefing on this policy.

Any questions about the policy should be directed to the HR Manager.

This policy is non-contractual and does not form part of an employee's terms and conditions of employment.

The policy is regularly reviewed (at least annually) and may be amended at any time.

Policy statement

Copper is fully committed to providing equality in the workplace and all opportunities for, and during employment, will be afforded to individuals fairly and irrespective of age, disability, gender, gender reassignment, marital or civil partnership status, pregnancy or maternity, race including colour, ethnic or national origins and nationality, religion or belief or sexual orientation.

We aim to create a working environment that is free from discrimination and harassment in any form, in which all staff, customers and suppliers are treated with dignity and respect.

The Company will not unlawfully discriminate in the arrangements we make for recruitment and selection or in the opportunities afforded for employment, training or any other benefit. All decisions will be made fairly and objectively. We aim, as far as reasonably practicable, to ensure that all our working practices are applied fairly and consistently and, where necessary, we will take reasonable steps to avoid or overcome any particular disadvantage these may cause and to promote equality.

Specific Responsibilities

Copper has overall responsibility for the effective operation of this policy and for ensuring compliance with the Equality Act 2010 and associated legislation and for observing relevant

Codes of Practice.

The HR Manager is responsible for monitoring and reviewing the policy and for ensuring that all employment-related policies, procedures and practices adhere to this policy.

All staff have a responsibility not to discriminate or harass other staff, clients/customers and suppliers and to report any such behaviour of which they become aware to their Manager, a Director or HR Manager.

Managers are responsible for implementing the Policy and must apply the policy as part of their day-to-day management of the Company. All Managers will receive specific training in this policy and related company processes eg. non-bias interview techniques.

Forms of discrimination

The following are forms of discrimination that this policy aims to avoid:

Direct Discrimination occurs when a person is treated less favourably because of a protected characteristic that they either have or are thought to have. Direct discrimination can also occur by way of association, which is when a person is treated less favourably because, for example, their spouse or partner or other relative has the protected characteristic.

Indirect Discrimination occurs when a provision, criterion or practice is applied equally to everyone, but has a disproportionately adverse effect on people who share a particular protected characteristic. A person with the protected characteristic who is disadvantaged in that way has the right to complain.

To be justified the provision, criterion, or practice must be necessary for legitimate business reasons in circumstances where less discriminatory alternatives are not reasonably available.

Victimisation occurs where someone is treated unfavourably because he/she has raised a complaint under this policy or taken legal action, in relation to any alleged act of unlawful discrimination, against the Company or because he/she has supported someone else in doing this.

Harassment is unwanted conduct that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Harassment can take many different forms and may involve inappropriate actions, behaviour, comments, emails or physical contact that causes offence or are objectionable.

Harassment may involve a single incident or persistent behaviour that extends over a period of time and can occur even if someone did not mean to cause offence. It also means that a person can be subjected to harassment by behaviour that is not aimed at them directly but which they nonetheless find unpleasant.

Harassment is always unacceptable and where it relates to a protected characteristic it will amount to an unlawful act of discrimination.

Discrimination arising from Disability - In addition to the above, it is unlawful to treat a person unfavourably because of something that is the result, effect or outcome of their disability, unless the treatment is necessary and can be objectively justified. Furthermore, employers have a duty to make reasonable adjustments to ensure that disabled applicants,

employees or other workers are not substantially disadvantaged.

Creating equal opportunities in the workplace

There are a number of ways in which the Company aims to ensure equal opportunities in the workplace, including:

Recruitment and selection

Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and will be based upon specific and reasonable job-related criteria. Please see our interview guidelines, question templates and candidate's skill table <F:\Copper\Human Resources\Interviews> (any queries please contact HR). Decisions regarding an individual's suitability for a particular role will be based on aptitude and ability.

We will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled applicants are not disadvantaged.

Wherever possible, vacancies will be advertised as being suitable for flexible working, to encourage applications from individuals seeking work on a part time or job share basis.

The Company will consider taking appropriate positive action to enable or encourage applications from persons with a protected characteristic that is under represented in the organisation. HR and the Chair are working closely with clients and industry bodies to identify ways to attract more diversity to the company and industry in general.

Career development and training

All staff will be given an appropriate induction to enable them to fulfil the responsibilities of their role.

All employees will be encouraged to develop their full potential and we will not unreasonably deny an employee access to training or other career development opportunities. Individual training requirements will be identified as part of an ongoing performance management process and will be determined objectively, taking into account the needs of the business and available resources.

Selection for promotion will be based on objective criteria and decisions will be made on the basis of merit.

Terms and conditions

Our terms and conditions of service will be applied fairly and benefits and facilities will be made available to all staff who should have access to them, as appropriate.

The Company operates a pay and benefits system that is transparent, based on objective criteria and free from bias to ensure that all employees are rewarded fairly for their contribution.

Terms and conditions of employment for part-time employees will be provided on a pro-rata basis to full-time employees. Similarly, the terms and conditions for fixed term employees will be comparable with those given to permanent employees, except when

different treatment can be objectively justified.

Employment policies and practices

Copper aims to ensure that employment policies and practices, including any rules or requirements, do not directly or indirectly discriminate and are applied in a non-discriminatory manner. In particular, we will ensure that all disciplinary decisions are fair and consistent and that selection for redundancy is based on objective criteria.

The Company will consider making appropriate reasonable adjustments to the working environment or any work arrangements that would alleviate any substantial disadvantage these cause disabled staff.

We will aim as far as reasonably practicable to accommodate the requirements of different religions and cultures and will consider requests from employees to vary or change their working hours to enable them to care for a dependant in accordance with the Company's Flexible Working Policy.

Working environment

All individuals have a right to be treated with dignity and respect and the Company takes reasonable steps to protect staff from discrimination, bullying or harassment and, in the event of a complaint, we will take appropriate action to prevent, as far as possible, a further occurrence.

All staff are encouraged to report any incidents of inappropriate or unacceptable behaviour at work or that occurs during the course of employment, on or off premises, including at work social events (whether organised by the Company or not) or at formal or informal events involving staff, customers or other work-related contacts.

Copper has a separate anti-harassment policy and procedure for dealing with complaints of harassment.

Equal Opportunities Monitoring

The Company will monitor the effectiveness of this policy to ensure it is achieving its objectives.

As part of this process we monitor:

- the composition of job applicants and decisions in recruitment (via our candidate's skill table)
- the composition of our workforce (via our annual benchmarking)
- access to training, promotion and other opportunities and benefits (recorded in our training records)
- the impact of our employment policies, including use of the disciplinary and grievance procedure
- dismissals and other terminations

Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.

Raising a complaint of discrimination

If you believe you have been discriminated against, you should raise the matter in accordance with Copper's Grievance Procedure. A copy of the Grievance Procedure can be

found here [..\Policies](#).

If you believe that you may have been subject to harassment you are encouraged to raise the matter under the Company's anti-harassment Policy [..\Policies](#).

Any employee who is found to have committed an act of discrimination, or breached this policy in any other way, will be subject to action under the Disciplinary Procedure, up to and including dismissal.

Non-employees will be subject to appropriate formal action that may, depending on the circumstances, involve terminating any contract or agreement.

The Company will also take seriously any malicious or, in its opinion, unwarranted allegations of discrimination and will take appropriate action, disciplinary or otherwise, where necessary.

A handwritten signature in cursive script that reads "Claire Gordon".

Chair
April 2019