

INS Equality at Work Statement

The Company is committed to a policy of equality and will comply with its statutory obligations.

It believes everyone must be treated fairly, with respect, and values the diversity that people of differing backgrounds and abilities bring to our business.

The Company's internal procedures for recruitment, development, training, career progression and reward and recognition will be business driven and will support our commitment to equality. These procedures will be monitored and reviewed to ensure their effectiveness.

The Company expects all employees to treat each other with respect and consideration. All employees are required to act in accordance with this policy and in particular line managers are responsible for ensuring that the policy is applied and upheld.

Actions and behaviour contrary to this policy, such as harassing or ridiculing other employees, will not be condoned or accepted. Anyone not behaving in accordance with this policy will be in breach of Company rules and will be held accountable for their actions. This will make them liable for formal action under the Company's disciplinary procedure.

This policy also covers our relationship with customers, suppliers and contractors. The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company.

The Company is committed to providing equal opportunities and in order to achieve its vision it must have a flexible and well motivated workforce. All employees must be able to maximise their contribution to the business. This cannot be achieved unless everyone's talents are fully stretched and developed.

To do this every employee needs to be given equal opportunity to develop and perform to the best of their ability.

This section sets out the Company's policy on equal opportunity. It is everyone's responsibility to translate this policy into reality, so that the business benefits from the very best efforts of its employees.

The above message, and the contents of this policy, are endorsed by the Executive team and the recognised trade union.

What does Equality at Work mean?

It means treating people such that they are not discriminated against or treated less favourably than others.

It means being committed to equal opportunities in all aspects of our business. That includes shortlisting, selection, training, promotion and career management. We do not discriminate against employees or job applicants on any grounds not justified in law or relevant to the performance of the job.

It means a working environment where everyone is treated with respect and proper consideration.

We believe that an effective equality at work policy is in the best interests of everyone – not only of existing and prospective employees, but also the Company itself – because it helps us to benefit from maximising and realising the full potential of our employees.

The Law

It is unlawful to discriminate directly or indirectly because of:

- Age
- Disability
- Sex
- Gender reassignment
- Pregnancy and Maternity
- Race (which includes colour, nationality and ethnic or national origins)
- Sexual orientation
- Religion or belief
- Because someone is married or in a civil partnership

These are known as "protected characteristics".

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

It is unlawful to discriminate directly or indirectly, harass or victimise a member of the public based on any of the protected characteristics in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features.

There is no limit on compensation for unlawful discrimination, which includes compensation for injury to feelings and personal injury

Responding to complaints

If an individual makes a complaint it will be investigated, it will be handled confidentially and nobody will be victimised because they have made a complaint.

If an individual believes they have been discriminated against or are being treated unacceptably, either by colleagues or management, they should raise this via their line manager.

If the problem is being caused by the individual's line manager then the matter should be referred directly to the Head of Department.

Alternatively, individuals can approach the Human Resources department and ask them to deal with the complaint.

At all times individuals can be accompanied by a colleague or a Trade Union representative.

If informal discussions do not resolve matters individuals can use the Company Complaint Procedure.

Employees commitment to INS Ltd.

All line managers are responsible for:

- effective implementation of our policy
- ensuring employees do not harass or behave unacceptably towards other employees.

All employees shall act in accordance with our policy and must not act in ways offensive to others e.g. abusing or ridiculing people because of their Protected Characteristic.

The actions of employees in the course of their work is regarded as being done by or on behalf of the Company. The Company will not accept nor condone unlawful, discriminatory or offensive behaviour towards any individual.

Any employee acting in such a fashion will be liable to disciplinary action and this could involve. This policy also covers our relationship with customers, suppliers and contractors. The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company.

Policy Implementation

The Company's Corporate Responsibility Director is accountable for the implementation of this policy including ensuring the monitoring and review of arrangements.

Line managers are responsible for ensuring the policy is implemented and maintained both with respect of the recruitment, development, training and advancement of employees in an open and non-discriminatory fashion, and also for ensuring that employees act in accordance with the policy.

Training and development will be provided for line managers, employers and employee representatives as appropriate with regard to the policy or relevant aspects. The effectiveness of arrangements will be reviewed by the Corporate Responsibility Director, who will provide reports on equal opportunities to the Companies Executive. Any information gathered will be shared with the unions.

The Company's Equality at Work policy was developed with the involvement of the recognised trade union who are committed to the implementation of this policy.

Examples of Discrimination

- Direct Discrimination
- Indirect Discrimination
- Discrimination by association
- Discrimination by perception

Direct Discrimination

This occurs when people are treated less favourably than others because of a protected characteristic they have or are thought to have, for example:

- refusing someone a job because of their colour or national origin. (Racial discrimination)
- refusing to consider men for jobs because the jobs are thought to be women's jobs, or equally,
- refusing to consider women for jobs because the jobs are thought to be men's jobs. (Sex discrimination)
- refusing someone a job because of their age or perceived age. (Age discrimination)
- refusing to appoint a married women to a job because it involves commitments and travel which
- 'might clash with family responsibilities', whilst a married man, single man, or single woman could
- be appointed. (Discrimination on sex and marital status).

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect Discrimination

This occurs when a condition or requirement is applied which, intentionally or accidentally, has a disproportionate effect on a protected characteristic, for example:

- in relation to a promotion, making a period of continuous employment essential criteria (Sex discrimination - women may be disproportionately affected due to breaks in employment to raise children)
- putting out a job advert requiring physical characteristics (Disability discrimination – no thought given to how the job could be modified to enable a disabled person to satisfactorily perform it)

Discrimination by association

This is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic, for example:

- withdrawing a promotion after an employee informs a line manager that they are caring for a disabled relative. This may be discrimination because of the employee's association with a disabled person.

Discrimination by perception

This is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic, for example:

- An employee who is 45 years old, but looks much younger, is not allowed to represent the company at an external meeting because his management think he is too young.