

## DIVERSITY, INCLUSION AND EQUALITY POLICY

### 1. INTRODUCTION

- First Sight Media ("the Company") is committed to promoting equal opportunities in employment and taking the necessary steps, to prevent all forms of discrimination within its activities and services. Employees and 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, gender identity or sexual orientation **(the Protected Characteristics)**.
- An essential aim of the policy is to promote effective and equitable employment and management practices, to enable the best possible use of the existing and potential workforce. It regards fair recruitment, selection and staff development policies and procedures as an essential contribution. This requires the Company to ensure that actual and potential discriminatory barriers are removed.
- This policy is not an end in itself but provides a framework for positive action. It should be applied in conjunction with the Company's existing policies and procedures. In particular those of recruitment and selection, grievance, disciplinary and sickness.
- The success of the Equal Opportunities Policy will depend on a high degree of understanding, **commitment and compliance from staff at all levels in the Company, with positive leadership from senior staff**. All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.
- This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.
- Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Company's Human Resources Department.

### 2. OUR COMMITMENT AS AN EMPLOYER

- To create an environment in which individual differences and the contributions of our staff are recognised and valued.
- Every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- Equality in the workplace is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.

### 3. OUR COMMITMENT AS A SERVICE PROVIDER

- We aim to provide services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class.
- We will make sure that our services are delivered equally and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients.
- This policy is fully supported by senior management and has been agreed with employee representatives.
- This policy will be monitored and reviewed annually.
- We have clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.
- Breaches of our Equality and Diversity Policy will be regarded as misconduct and could lead to disciplinary proceedings.

### 4. POLICY STATEMENT

The Company maintains to provide services and

#### I. AGE. We will:

- ensure that people of all ages are treated with respect and dignity;
- ensure that people are given equal access to our employment, training, development and promotion opportunities; and
- challenge discriminatory assumptions about younger and older people.

#### II. DISABILITY. We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities;
- challenge discriminatory assumptions about disabled people; and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.

#### III. RACE. We will:

- challenge racism wherever it occurs;
- respond swiftly and sensitively to racist incidents; and
- actively promote race equality in the Company.

#### IV. GENDER. We will:

- challenge discriminatory assumptions about gender;
- take positive action to redress the negative effects of discrimination against everyone;

- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same; and
- provide support to prevent discrimination against transgender people who have or who are about to undergo gender reassignment.

V. SEXUAL ORIENTATION. We will:

- ensure that we take account of the needs of everyone, including the LGBTQ+ communities; and
- promote positive images of the LGBTQ+ communities.

VI. RELIGION OR BELIEF. We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

VII. PREGNANCY OR MATERNITY We will:

- Ensure that people are treated with respect and dignity during pregnancy and during maternity leave;
- challenge discriminatory assumptions about pregnancy and maternity leave; and
- ensure that no individual is disadvantaged as a result of pregnancy or maternity leave and that we take account of the needs of our employees during pregnancy and during maternity leave.

VIII. MARRIAGE OR CIVIL PARTNERSHIP. We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees; and
- ensure that no individual is disadvantaged as a result of their marriage or civil partnership status.

IX. EQUAL PAY. We will:

- ensure that all employees have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

## 5. DISCRIMINATION

- Staff 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 (or when wearing a work uniform), and on work-related trips or events including social events.

- The following forms of discrimination are prohibited under this policy and are unlawful under the Equality Act 2010:

(a) 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;

(b) 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;

(c) 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;

(d) Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment;

(e) 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.

## 6. RESPONSIBILITIES

- The Company has a primary legal and moral responsibility for ensuring that the Equal Opportunities Policy is successfully implemented. It has a commitment not merely to avoid discrimination, but to develop positive policies to promote equal opportunities. The Company is liable, together with its employees, for any acts of unlawful discrimination by staff, even when such acts are carried out without the Company's knowledge or approval. Ignorance of discrimination is not grounds for escaping liability.
- Managers will be required, as part of the business planning and ongoing management process to develop, where appropriate, positive action programmes to remedy identified inequalities and under-representation of particular groups in the workforce.
- The Board of Directors aim to promote initiatives, proposals and developments that address the key principles of the Equal Opportunities Policy and will allocate resources as appropriate and reasonable to support these initiatives.

## 7. RECRUITMENT AND SELECTION

The aim of the Equal Opportunities Policy is to ensure that discrimination does not occur on the basis of the protected Characteristics and matters which are irrelevant to the requirements of a particular post. The key principles of good practice are:

- The establishment of a systematic approach to recruitment and selection

- The specification of the requirements of the post and
- The selection of individuals against those requirements.

#### I. JOB DESCRIPTION

All recruitment must begin with an up-to-date description and person specification. The job description and person specification should form the basis for the selection process in advertising the post, short listing and in assessing applicants at interview. The job description should normally include:

- Location(s) of the post
- Job title
- Speciality of the job
- Accountability of the postholder within the organisation
- Key duties of the post
- Principal terms and conditions of service
- Salary (and scale if appropriate), allowances and additions

Job descriptions must be reviewed by the appropriate manager prior to advertising the post, to ensure they are comprehensive, accurate and in line with good practice.

Selection criteria must be objective, job related and applied consistently to candidates.

#### II. PERSON SPECIFICATION

A person specification is derived from the job description and outlines the minimum qualifications, skills and experience required to perform the job. It should indicate what is essential and what is desirable, highlighting the key criteria, which will be used to judge candidates. It is good practice for applicants to be given a copy of the person specification, or a summary, so that they know by what criteria they will be judged.

#### III. ADVERTISING

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. They should include a short policy statement on equal opportunities and a copy of this policy will be made available on request.

#### IV. SHORT LISTING

Objective short listing requires the use of agreed selection criteria contained in the job description and person specification. The following procedures will apply:

- Short-listing must never be undertaken by one person only and with the involvement of the Human Resources Department where possible;
- Those involved in interviewing should be involved in short listing;
- Selectors will be required to record an outline of the reasons for their short-listing decisions;

- Any doubts over the short-listing process should be raised with a director.

## V. REFERENCES

- References must be used in a structured, systematic and consistent way to ensure the same questions in respect of candidates for a particular post are addressed to all referees.
- Their main purpose should be to verify information and comment on the strengths and weaknesses of an applicant as an indicator of that person's suitability to the post.
- Unsolicited references will form no part of the selection process.
- Verbal references are admissible subject to written confirmation.

## VI. THE INTERVIEW PROCEDURE

- There must always be two interviewers.
- The interview should be planned in structure and content to ensure that applicants are assessed in a consistent manner.
- No irrelevant questions with regard to candidates' domestic or personal criteria should be posed.
- 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.
- Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the Human Resources Department. For example:
  - (a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
  - (b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
  - (c) Positive action to recruit disabled persons.
  - (d) Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check.

## VII. ASSESSMENT AND DECISION-MAKING

- The decision-making process should be systematically based on the agreed selection criteria drawn from the job description and person specification.
- Records of the assessment process should be kept, including reasons for choosing successful candidates, rejecting unsuccessful candidates or appointing second candidates should the preferred candidate fail to take the appointment.
- Appropriate and courteous arrangements must apply for rejecting all unsuccessful candidates.

## 8. IMMIGRATION REQUIREMENTS

The Company is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the Human Resources Department.

## 9. TRAINING AND PROMOTION AND CONDITIONS OF SERVICE

- Training needs will be identified through regular appraisals. Staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.
- Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.
- The Company's conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

## 10. TERMINATION OF EMPLOYMENT

- The Company will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- The Company will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

## 11. DISABILITIES

- If an employee is disabled or become disabled, the Company encourages them to tell us about their condition so that the Company can support them as appropriate.
- If an employee experiences difficulty at work because of their disability, they may wish to contact their line manager and/or the Human Resources Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The line manager and /or the Human Resources Department may wish to consult with the employee's medical adviser or an independent occupational health about possible adjustments. The Company will consider the matter carefully and try to accommodate the employee's needs within reason.
- The Company will monitor the physical features of its premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, the Company will take reasonable steps to improve access.

## 12. PART-TIME AND FIXED-TERM WORK

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

### 13. BREACHES OF THIS POLICY

- The Company will take a strict approach to breaches of this policy, which will be dealt with in accordance with its Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- If a member of staff believe that they have suffered discrimination they should raise the matter through the Company's Grievance Procedure or through our Anti-harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

### 14. RELATED POLICES

This policy is supported by the following other policies and procedures:

- Anti-Harassment and Bullying Policy;
- Grievance Procedure;
- Disciplinary Procedure;
- Flexible Working Procedure;
- Maternity, Paternity, Adoption and Shared Parental Leave Policies;
- Parental Leave Policy;
- Time Off for Dependants Policy;
- Dress Code.

### 15. MONITORING AND REVIEW

The policy will be monitored and evaluated to assess the effectiveness of the implementation of the Equal Opportunities Policy.

## Change History

Date	Version	Description of Modification	Modified By
1 <sup>st</sup> July 2021	3.0	New document creation	Rich Belcher
8 <sup>th</sup> March 2022	3.1	Added section on employment	Rich Belcher
1 <sup>st</sup> July 2022	3.1	Annual document review	Kora Slade
29 <sup>th</sup> June 2023	3.2	Annual document review	Kora Slade
Approved By	Date	Version	
Rich Belcher	4 <sup>th</sup> July 2023	3.2	