

Equality & Diversity Policy

Version No:	0.1
Date:	September 2011
Owner:	Karen Martin

The Cabot Credit Management Group incorporates:



Contents

1. KEY WORDS.....	3
2. INTRODUCTION	3
3. THE POLICY	4
3.1. Responsibilities.....	4
3.1.1. Company	4
3.1.2. Employees and other individuals	4
3.2. Types of discrimination	4
3.2.1. Direct discrimination	4
3.2.2. Indirect discrimination	4
3.2.3. Victimisation	4
3.2.4. Harassment	5
4. Promotion of Equal Opportunities	5
4.1. Recruitment and selection	5
4.2. Employee training, promotion, terms and conditions and benefits.....	5
4.3. Termination of employment.....	5
4.4. Disability discrimination.....	6
5. THE ENFORCEMENT PROCEDURE.....	6
5.1. The Informal Complaints Procedure.....	6
5.2. The Formal Complaints Procedure	7
6. RELATED POLICIES.....	7
7. MONITORING AND REVIEW	7

1. KEY WORDS

Word	Meaning
Company	The word Company throughout the Policy refers to either Cabot Financial (Europe) Ltd or Apex Credit Management Ltd.
Protected characteristics	Characteristics protected by Equality legislation including gender, sexual orientation, marital or civil partner status, gender reassignment, race, creed, religion, belief, colour, nationality, ethnicity, disability and age.

2. INTRODUCTION

The Company values and is committed to promoting equal opportunities and diversity in the workplace. The Company endeavours to provide a working environment in which everyone is treated fairly and with respect, has the opportunity to succeed and is not subjected to any prejudice or unlawful discrimination on the grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, creed, religion, belief, colour, nationality, ethnicity, disability, age, pregnancy, maternity, trade union membership or part time or fixed term status.

Most of the above are “protected characteristics” under equality legislation and some are additional characteristics which the Company wishes this policy to apply to.

This policy applies to the advertising of jobs, the recruitment and selection process, access to the Company’s facilities, training and development, promotion, entitlement to conditions of service, benefits, pay, health and safety and access to our conduct at work, grievance and disciplinary procedures and termination of employment, including redundancy and references for former employees.

The Company expects all employees to respect and support our commitment to equality and diversity and this policy therefore aims to ensure that everyone understands what they can expect from the Company and what is expected of them in terms of conduct and behaviour.

The Company takes any breach of this Policy including acts of discrimination, harassment, bullying or victimisation against employees very seriously. They are serious disciplinary offences and will be dealt with under the Company’s disciplinary procedure. Misconduct of this type may be deemed gross misconduct and may lead to dismissal without notice

This Policy applies to all employees, applicants or ex employees and to individuals such as agency staff, consultants or contractors who are not our employees but who work for or on behalf the Company.

This policy is not intended to form part of your contract of employment and we reserve the right to amend it at any time.

3. THE POLICY

3.1. Responsibilities

3.1.1. Company

The Company is responsible for ensuring that the Policy and supporting procedures are communicated, implemented and adhered to and monitored. The Company is also responsible for dealing appropriately and effectively with any contraventions.

3.1.2. Employees and other individuals

Everyone is responsible for ensuring they uphold the Company's Equality and Diversity Policy in their dealings with customers, employees, other individuals who work for the Company and job applicants.

Employees and other individuals must treat others fairly and with respect, not allowing prejudice to affect their actions or behaviour and not unlawfully or unfairly discriminating against anyone.

To ensure that they act in the spirit of this policy employees and other workers are expected to develop their awareness of equality issues and the various types of discrimination which can exist.

The Grievance Procedure should be used to bring to the Company's attention any concerns they have about the policy not being upheld that they are not able to deal with themselves informally.

3.2. Types of discrimination

Every employee must fully understand the different forms of direct and indirect discrimination, harassment and bullying by familiarising themselves with the definitions below.

3.2.1. Direct discrimination

This is when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (i.e. perception discrimination) or because they associate with someone who has a protected characteristic (i.e. discrimination by association).

3.2.2. Indirect discrimination

This is when a condition, rule, policy or even a practice is applied to everyone but particularly disadvantages people who share a protected characteristic and cannot be objectively justified.

3.2.3. Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance about discriminatory treatment or because they are suspected of doing so.

3.2.4. 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”.

4. Promotion of Equal Opportunities

4.1. Recruitment and selection

- The Company aims to ensure that no job applicant receives less favorable treatment on any of the unlawful grounds listed in section 2.
- Recruitment and selection procedures are reviewed regularly to ensure they are non discriminatory, that decisions are based on objective and relevant criteria and that applicants are judged on the basis of their relevant merits and abilities.
- The Company shall take steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups under-represented in the Company.
- To help the Company evaluate the effectiveness of our recruitment and selection procedure and to identify any groups who are under-represented the Company monitors applicants’ racial origins, gender, disability, sexual orientation, religion and age. This data is retained in an anonymised format solely for this purpose. It is regularly reviewed and provides the basis for taking appropriate steps to eliminate any unlawful discrimination and promote equal opportunity and diversity.

4.2. Employee training, promotion, terms and conditions and benefits

- Employee training needs are identified through regular staff appraisals. All employees will be given appropriate access to training to enable them to perform their role effectively and progress within the organisation. All promotion decisions will be made on the basis of merit.
- The composition of our workforce, promotions and transfers and access to our terms and conditions, benefits and facilities are regularly reviewed to ensure there is equality of opportunity at all levels and across all areas of the organisation.
- Part-time employees are offered appropriate access to benefits and training and promotion opportunities. The Company also ensures that requests to alter working hours are dealt with appropriately under the Flexible Working Policy.
- Fixed-term employees and agency workers are offered appropriate access to benefits, training, promotion and permanent employment opportunities.

4.3. Termination of employment

- Redundancy criteria and procedures are monitored to ensure that they are fair and objective and do not directly or indirectly discriminate.
- The Company endeavours to ensure that disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

4.4. Disability discrimination

- A person is disabled if “they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, which would include things like using a telephone, reading a book or using public transport.”
- If an employee is disabled or becomes disabled in the course of their employment with the Company they are encouraged to tell their Line Manager about their condition so that we can support the employee as much as possible.
- The Line Manager will discuss with the employee what, if any, reasonable adjustments to the employee’s working conditions and/or duties are required.
- Careful consideration will be given to any such proposals and they will be accommodated where reasonable and practicable.
- The Company premises have been and will continue to be reviewed to identify if any aspects places disabled workers, job applicants or service users at a substantial disadvantage compared to other workers. Where possible and proportionate, the Company will take steps to improve access for disabled workers and service users.
- The Company will take into consideration behavior that is connected with a disability (e.g. a tendency to make spelling mistakes arising from dyslexia) when dealing with any employee who has a disability to ensure discrimination does not occur.

5. THE ENFORCEMENT PROCEDURE

Any individual who believes in good faith that they or others are the subject of any form of discrimination as listed above should refer to the **Company Grievance Policy** and procedures.

All complaints, grievances or concerns will be taken seriously and dealt with efficiently and confidentially and care will be taken to protect the interests of both the complainant and the alleged perpetrator throughout the process.

An employee may also raise a grievance on behalf of someone whom they believe to be the subject of discrimination.

Any individual who is not an employee should follow the same procedure and raise their concerns to the person who has engaged them, a more Senior Manager within the business or a member of the HR team, as appropriate.

There are 2 steps which employees should follow to resolve an unwanted situation:

5.1. The Informal Complaints Procedure

Any employee who believes in good faith that they are the subject of any form of discrimination should, in the first instance, raise the issue or concern informally with the individual concerned.

Employees should remember that sometimes actions can be misconstrued; having an impact on a fellow employee that was never intended and in such situations we would all

prefer to be given the opportunity to respond to a fellow employee's concerns and rectify the situation informally if at all possible.

Matters that are of concern should always be raised in a timely manner, ideally at the time of their occurrence. This gives all parties the best opportunity of resolving the matter.

Where possible in the first instance all employees should give direct feedback to the person whose behaviour has caused the distress. It is important to let them know that their behaviour is unwelcome, and ask them to modify this accordingly. As with all feedback this must be done in a constructive, considered manner, giving all involved the opportunity to modify their behaviour and learn from the experience.

Where the employee requires assistance to do this they should ask their Line Manager for support them.

5.2. The Formal Complaints Procedure

Whether informal steps have been taken or not, if the behaviour continues or if a single incident is too serious to deal with informally, the employee should use the Grievance Procedure to raise the matter formally in writing with their Line Manager.

Where an employee feels unable to discuss the matter with their Line Manager or where the discrimination relates to an employee's Line Manager, the employee should raise the matter informally or formally, as appropriate, with a more Senior Manager in their business area or one of the HR team.

Any individual who brings a false complaint of discriminatory treatment may also be subject to a disciplinary hearing.

6. RELATED POLICIES

- Harassment & Bullying Policy
- Grievance Policy
- Whistleblowing Policy

7. MONITORING AND REVIEW

On a quarterly basis, the HR Department will report on our equality and diversity performance. Statistics relating to gender, age, disability, ethnic origin and full/part-time hours will be collated and circulated to the Senior Leadership Team.

This policy and procedure will be monitored by Line Management and will be reviewed annually by the HR Department to ensure that the policy is compliant with current statutory requirements and aligned to the needs of the Company and our employees.