

Britannia Construction Limited is committed to building an organisation that makes full use of the talents, skills, experience and different cultural perspectives available in a multi-ethnic and diverse society, where people feel they are respected and valued and can achieve their potential regardless of sex, race, colour, nationality, national or ethnic origins, sexual orientation, marital status, civil partnership status, trans-gender, disability, religion or age.

Britannia Construction Limited upholds the Code of Practice and the recommendations of the Commission of Racial Equality, Equal Opportunities Commission and the Disability Rights Commission. We seek to ensure that the organisation abides by the Sex Discrimination Act 1975, the Race Relations Act 1976, the Disability Discrimination Act 1995, the Employment Equality (Religion or Belief) Regulations 2003, the Employment Equality (Sexual Orientation) Regulations 2003 and the Employment Equality (Age) Regulations 2006.

**The aims of this policy are to ensure that:**

- All job applicants and employees are treated fairly and equally, regardless of their sex, trans-gender status, sexual orientation, religion or belief, marital status, civil partnership status, age, race, colour, nationality, national or ethnic origin disability or age. That no-one receives less favourable treatment or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds, or victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.
- The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, or humiliating environment.
- Opportunities for employment, training and promotion are equally open to all.
- Selection for employment, promotion, transfer, training and access to benefits, facilities and services, will be fair and equitable and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights.

**We will endeavour to take the following steps to implement the policy into practice and seek to ensure that it is achieving its aims:**

1. The Managing Director will be responsible for the day to day operation of the policy.

2. The Company will endeavour to communicate the policy to its workers and job applicants. The policy will also be included in the Staff Handbook.
3. Where possible the Company will endeavour to consult workers and their representatives about the policy and, as necessary, about related action plans and strategies.
4. The Company will seek to make all workers aware of the policy, on their rights and responsibilities under the policy and on how the policy will affect the way they carry out their duties.
5. The Company will seek to advise Managers and workers in key decision-making areas on the discriminatory effects that provisions, practices, requirements, conditions and criteria can have on some groups and the importance of being able to justify decisions to apply them.
6. Complaints about discrimination or harassment in the course of employment will be regarded seriously and may result in disciplinary action, which may lead to dismissal. The grievance procedure will also be published in the Staff Handbook.
7. Where appropriate opportunities for employment, promotion, transfer and training will be advertised and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability or age.
8. The Company aims to encourage workers to develop their skills and qualifications and to take advantage of promotion and development opportunities in the organisation.
9. Selection criteria will be entirely related to the job or training opportunity.
10. We will make, where possible, reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work and for disabled customers to access our services.
11. We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively and will aim to accommodate them unless it would cause significant difficulties to the business or the employee.
12. Where provided, information on the ethnic and racial background, gender, disability, marital status and age of each worker and applicant for employment, promotion and training will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity.

13. If the data shows that people from a particular gender, racial group, or age band may be under-represented in particular areas of work, the Company, wherever possible, will aspire to take lawful positive action. Training and encouragement will be considered for workers and others from that group, to improve their chances of applying successfully for vacancies in these areas.
14. Grievances, disciplinary action, performance assessment, and terminations of employment, for whatever reason, may also be monitored by gender, racial group, age, marital status, and disability.
15. The Company will endeavour to review, on a regular basis, its requirements, conditions, provisions, criteria, and practices.
16. The Company requires its contractors and sub-contractors to comply with the practices contained in this policy and to ensure that their staff are appraised of the requirements and that they, contractors and sub-contracts, provide equality of opportunity in their employment practices.
17. The effectiveness of the policy will be monitored on a regular basis by the Senior Management.
18. Where possible, customers and clients will be made aware of the policy, and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability, religion or age.

Overall responsibility for the effectiveness of the policy lies with the Managing Director.

A handwritten signature in black ink, appearing to read "P. Halfpenny", with a long horizontal stroke extending to the right.

**Signed:**

PAUL HALFPENNY  
Managing Director

**Date:** 9th February 2009