



Non-Discrimination Policy

Introduction

Corporate Learning Consultants Ltd is committed to providing a working environment free from intimidating or humiliating behaviour.

General commitment

Corporate Learning Consultants Ltd is committed to eliminating discrimination and promoting equality and diversity. The company intends to treat everyone equally and with the same attention, courtesy and respect regardless of their race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

Regulation and Legislation

In developing and implementing this Non-Discrimination policy, the company is committed to complying with the following legislation, in particular:

- The Employment Act (2002)
- The Employment Relations Act (2004)
- The Sex Discrimination Act (1975)
- The Race Relations Act (1976)
- The Disability Discrimination Act (1995)
- The Equal Pay Act (1970)
- The Protection from Harassment Act (1997)
- The Part-time Workers (Prevention of Less Favourable Treatment) Regulations (2000)
- The Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations (2002)
- Rehabilitation of Offenders Act (1974)
- Work and Families Act (2006)
- The Employment Equality (Age) Regulations (2006)
- The Employment Equality (sexual orientation) Regulations (2003)
- The Employment Equality (Religion or Belief) Regulation (2003) and any relevant amendments or re-enactments of such legislation.

Forms of discrimination

The following are the kinds of discrimination, which are unacceptable to the company:

- (a) **Direct discrimination:** where a person is treated less favourably on the grounds of race, colour, ethnic origin, nationality, national origin,



- religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.
- (b) **Indirect discrimination:** where an apparently neutral provision, criterion or practice would put a substantially higher proportion of the members of one sex, or persons having a racial or ethnic origin, or a particular religion or belief, or of a particular age, or a particular disability or a particular sexual orientation at a particular disadvantage compared with other persons unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.
 - (c) **Victimisation:** where someone is treated less favourably than others as a result of exercising their rights under company policy or legislation e.g. where less favourable treatment is experienced by an employee who has raised a grievance.
 - (d) **Harassment:** when unwanted conduct related to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability, takes place with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may take many forms including physical acts, or verbal/non verbal communications and gestures. Harassment occurs when the recipient perceives the behaviour, deliberate or not, to be offensive or objectionable.

It is of little consequence whether the behaviour was not intended to be offensive, it is how it is received. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

Behaviour which a reasonable person would realise would be likely to offend an employee will constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Harassment also occurs where, on the ground of the employee's rejection of or submission to unwanted conduct of the kind specified above, a person treats the employee less favourably than he or she would treat him or her had he or she not rejected, or submitted to, the unwanted conduct.



Positive action

Although it is unlawful positively to discriminate in favour of certain groups on the grounds of race or sex, positive action to enable greater representation of under-represented groups is permitted by law and will be considered as appropriate by Corporate Learning Consultants Ltd .

Recruitment and promotion

We will ensure that roles are filled on a basis of competence, qualification and potential. We will act in a non-discriminatory way towards all potential and actual applicants during the recruitment process and comply with legislative requirements regarding direct and indirect discrimination on the basis of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

We will use eligibility criteria which are fair to everyone whilst being supportive of our business goals. We will do this by regularly reviewing company procedures and documents including job descriptions, job advertisements, employment agency instructions and application forms.

Training and development

We will support the training and development of employees to fulfil our business needs and to help realise their full potential. We will ensure opportunities for training and development are made equally available to all employees, basing decisions of qualification, experience and potential of the employee.

Culture

We will ensure that all employees work in an environment without discrimination, harassment or victimisation. We will commit to making reasonable adjustments for employees where required.

Terms and conditions of employment, benefits and facilities

Company documentation relating to the Terms and Conditions of Employment, including Employee Handbook, policies and procedures and Statements of Terms and Conditions of Employment, will be written and implemented without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability. All terms and conditions, benefits, facilities and service will be reviewed from time to time to ensure that there is no unlawful discrimination.



Monitor and review

This policy will be monitored periodically by Corporate Learning Consultants Ltd to judge its effectiveness. The Director (Consulting) will be responsible for the operation of the policy. In particular, it is our intention to monitor the gender, marital status, age, sexual orientation, disabilities, race, nationality ethnic origin and religion of existing employees and of applicants for jobs (including promotion), and will review the Equality and Diversity Policy in accordance with the results shown by the monitoring. If changes are required, Corporate Learning Consultants Ltd will implement them.

Communication and training

Employees will be made aware of this policy and trained to be able to meet their responsibilities effectively. We will also endeavour to ensure our clients, business partners and suppliers are fully aware of our commitment to diversity and a fair and equitable workplace and are willing to work in a spirit of cooperation with Corporate Learning Consultants Ltd under these guidelines.

Complaints and grievances

You should draw the attention of your line manager to suspected discriminatory acts or practices or suspected cases of harassment. In line with the Company's grievance procedure, we will in a timely, effective, confidential and sensitive manner, deal with any complaints of alleged discrimination, victimisation and harassment, ensuring that all such complaints are fully investigated and that necessary action is taken.

The Company and its employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.

Disciplinary

Acts of discrimination, victimisation or harassment on grounds of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability by employees, suppliers, partners or clients of the company are unacceptable. Disciplinary action will be taken against employees who breach this policy and Corporate Learning Consultants Ltd will make representations to its suppliers and partners to take appropriate action where their employees behave inappropriately.



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Acts of discrimination, harassment or victimisation may constitute gross misconduct which could result in an employee being summarily dismissed. In addition, line managers who had knowledge that such discrimination, victimisation or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.