T.W.R. Commercial Limited

TWR Guidance

Equal Opportunities Policy

TWR Commercial Limited 1.8

Equal Opportunities Policy

General Statement	**1**
Responsibilities	**2**
Legal Framework	**3**
Discrimination	**3**
Disability Discrimination Act	**4**
Monitoring and Review	**4**
Publication	**4**
Looking to the Future	**5**

No part of this document may be reproduced without written consent of TWR Commercial Limited. This guidance document is to be read in conjunction with all relevant standards. This document is provided as is and written in good faith, but no responsibility can be accepted for errors or omissions or liability for any actions taken because of this document.

Equal Opportunities Policy

General statement

TWR recognises the benefits of having a diverse community of staff, who value one another and the different contributions they can make to achieve the company's mission to be successful.

TWR is committed to being an equal opportunities employer, providing equality of opportunity for all staff and applicants. In the provision of equal opportunities, TWR recognises and accepts its responsibilities under the law.

The policy aims to provide equality of opportunity regardless of gender, ethnicity, colour, disability, religion, age, sexual orientation, or marital status.

TWR seeks to create an open and supportive environment which is free from discrimination, and which encourages all staff to participate fully in TWR activities.

This policy applies to all aspects of TWR staff, including sub-contracted staff.

Date **5th January 2010**

Managing Director **Terry Richardson**

Sign

Responsibilities

Staff are encouraged to assist in promoting equal opportunities by bringing discriminatory practices to the attention of the Managing Director.

TWR Managers and those staff with leadership roles will, through their responsibilities, be proactive in promoting diversity and equal opportunities, and in tackling discrimination.

TWR will ensure that:

- All staff are aware of the Equal Opportunities Policy
- The implementation of equal opportunities is adequately monitored
- Staff and Union representatives are provided with appropriate foray to discuss and deal with equal opportunities issues.
- Clear and publicly accessible procedures are in place for the fair selection and are free from discrimination.
- The Managing Director Terry Richardson is responsible for ensuring that TWR staff adheres to the Equal Opportunities Policy.

All TWR staff will:

- Support and implement the Equal Opportunities Policy, and
- Ensure that their behaviour and/or actions do not amount to discrimination or harassment in any way.

The development and monitoring of the Equal Opportunities Policy is supported by the Equal Opportunities Officer, who is responsible for developing and co-ordinating initiatives that will enhance diversity and equality of opportunity within the Company.

TWR staffs are required to comply with this policy and with the relevant legal requirements, and are expected to promote a culture free of discrimination, prejudice and all forms of harassment and bullying. Any incidents of discrimination, harassment or bullying will be investigated and may be grounds for disciplinary action.

The legal Framework

The following legislation applies to all:

- Sex Discrimination Act 1975 as amended 2003
- The Race Relations Act 1976 as amended 2000
- Disability Discrimination Act 1995 as amended 2001, 2003
- Prevention from Harassment Act 1997
- Human Rights Act 1998
- Race Relations Amendment Regulations, 2003

Discrimination

The Race Relations Act outlines four main forms of unlawful discrimination: direct discrimination, indirect discrimination, victimisation and harassment. The following definitions are taken from the Race Relations Act. These classifications also apply under the Sex Discrimination Act and the Employment Equality (Sexual Orientation and Religion and Belief) Regulations.

Direct discrimination - this occurs when a person is treated less favourably on racial grounds than another person is, or would be, treated in the same or similar circumstances. Direct discrimination is automatically unlawful, whatever the reason for it, and no justification can be put forward to excuse the difference in treatment.

Indirect discrimination - consists of applying in any circumstances covered by the Act, a requirement or condition which, although applied equally to persons of all racial groups, is such that a considerably smaller proportion of a particular racial group can comply with it and it cannot be shown to be justifiable on other than racial grounds, for example, a rule about clothing or uniforms which disproportionately disadvantages a racial group and cannot be justified.

Victimisation - this occurs when a person is treated less favourably than another is, or would be, treated because they have brought, or are suspected of having brought, legal proceedings under the Act, or because they have given evidence or information on behalf of someone else's complaint, or because they have complained of discrimination.

Harassment - this occurs when a person harasses another on grounds of race, or ethnic or national origin when his or her behaviour is unwanted, and when it has the purpose or effect of violating the other person's dignity or creating an intimidating, hostile, degrading, or offensive environment for them.

Disability Discrimination Act
Under the Disability Discrimination Act 1995 (as amended 2001) discrimination against disabled people can take place in either of three ways:

- When a responsible body treats a disabled person less favourably, for a reason relating to the person's disability, than it treats (or would treat) a person to whom that reason does not, or would not, apply and that treatment cannot be justified**.**
- By failing to take reasonable steps to ensure that disabled people are not placed at a "substantial disadvantage" compared to other people, without justification. This is known as the reasonable adjustments duty.
- Victimisation is a special form of discrimination covered by the Act. It applies whether or not the person victimised is a disabled person, as defined above under the Race Relations Act.

All material published by TWR will seek to avoid the use of offensive and discriminatory language and images. Publicity materials will include a statement outlining the TWR commitment to equality of opportunity and diversity.

Monitoring and Review

TWR Equal Opportunities Group will review reports from Staff and agree appropriate actions; reports will then go to the Managing Director.

Advice and information on equal opportunities implementation and issues can be sought from the Equal Opportunities Officer.

Publication.

TWR will:

- Publicise and promote the policy through the staff notice boards and the companies' websites and brochures.
- Make a copy of the policy available to current staff and issue new staff with a copy of the policy with their induction folder.
- Make our customers aware of the policy and issue the policy were required.
- Make the policy available to trade organisations for display on their websites.

Looking to the Future

A recent review of the current TWR Equal Opportunities Policy revealed the need for updating and revision in light of the specific needs of TWR staff. As a result, an Equal Opportunities sub-committee was convened and will continue, and, following wide consultation, the sub-committee identified the following points of action:

- The need for staff training in Equal Opportunities issues and guidelines
- The need for a recruitment monitoring form to accompany all application forms

ADM	CB	JAN 2010	1.8

White Paper

TWR Commercial Limited