
5.0 Equality, Equal Opportunities and Diversity

5.1 Equal Opportunities Policy Statement

Provelio continually strives to be an equal opportunities employer. We are committed to continuing to build an organisation that makes full use of the talents, skills and experience and different cultural perspectives available in a multi-ethnic society. You and any job applicants will receive equal treatment regardless of sex, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability, age, pregnancy or maternity (**Protected Characteristic**).

Our policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including, recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

Our policy is to:

- Set no limit, in the normal course of events, to the level any employee can rise in Provelio when appropriate opportunities arise, given the right ability, competence and experience.
- Value the diversity and creative potential that staff with differing backgrounds, skills and abilities bring to Provelio.
- Provide a flexible working environment where people feel they are valued as individuals.
- Foster an environment free from discrimination, bullying and harassment.
- Seek to cultivate individual potential, so that everyone associated with Provelio is able to act without prejudice and with open and critical minds.
- Increase awareness of equal opportunities legislation and good practice through training, advice and the provision of information.
- Reduce obstacles to equal opportunities, including where appropriate making reasonable adjustments to jobs, working conditions, the working environment and office equipment.
- Challenge and eliminate discrimination, bullying or harassment if it occurs, including taking appropriate disciplinary action against staff who fail to comply with this policy.

This policy applies to all grades of staff and management, wherever employed, and to all job applicants. The policy is communicated to all staff and job applicants and will be placed on the company's intranet and website. When applicable, documented specific policies and procedures for particular countries will be issued and apply to the relevant staff.

The Directors have overall responsibility for monitoring and reviewing the policies and practices within Provelio to ensure the promotion and implementation of equal opportunity.

Provelio's commitment to equality and diversity is an active one. This document will be amended on an annual basis as part of this active commitment.

Provelio will seek to keep up-to-date with new developments in Equality and Diversity practice and actively seek information on this issue.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Anyone who suspects that they are being harassed or bullied should refer to the Anti-Bullying and Harassment Policy.

5.2 Equality and Diversity Policy

Our aim is to create a supportive and inclusive culture that makes full use of the talents, skills and experience and different cultural perspectives available in a multi-ethnic society. We aim to ensure that no job applicant, employee or client receives less favourable treatment on the grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, disability or age, pregnancy and maternity. By integrating individual strengths, we recognise that we can maximise efficiency and creativity. This inclusive culture is reflected in our values and principles and all employees, whether full-time or part-time or temporary will be treated fairly and with respect.

Our Aims

Provelio will work to ensure that employees are:

- Treated fairly and without discrimination during their employment, commencing with the recruitment process and have access to promotions when available based only on aptitude and ability.
- Fairly appraised and rewarded for personal contributions to the organisation, taking into account internal and external comparisons and affordability. All employees are paid above the National Minimum Wage as determined by the National Minimum Wage Act 1998 and this is carefully monitored by our payroll staff.
- Able to work in a healthy and safe environment free from hazards.
- Able to access opportunities for training and development to develop to their full potential.
- Supported in balancing work and home life commitments and have requests considered objectively.
- Treated with dignity and respect in a fair and consistent manner in an environment where inappropriate behaviour is not acceptable.

Recognition of Legal Requirements

Provelio is committed to eliminating discrimination and encouraging diversity amongst our workforce.

The company fully respects and endorses the legal provisions of the:

- Human Rights Act 1998, which ensures basic human rights provision and
- The Equality Act 2010 which aims to provide protection from direct and indirect discrimination and unlawful harassment for the following protected characteristics:
 - Age (including any provisions of the Employment Equality regulations 2006 now superseded by the Equality Act 2010)
 - Disability (superseding the Disability Discrimination Act 2005) includes the requirement to make reasonable access and working environment adjustments when aware of an individual's disability
 - Gender reassignment (including compliance with the Gender Recognition Act 2004 - the requirement to accept legally acquired gender changes when applicable)
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex (including any provision of the Sex Discrimination Act 1975 that remains in force following the Equality Act 2010)
 - Sexual orientation

Roles, Responsibilities and Senior Management Endorsement of the Policy

Provelio's Board of Directors has ultimate responsibility for the equality and diversity policy. It is however the responsibility of the HR Director to implement, monitor and evaluate the policy in terms of employment, practice and service delivery. The policy will be reviewed and monitored annually. The HR Director reports to the Board of Directors on a monthly basis. This policy is therefore fully supported by all of the senior management team.

5.3 Discrimination

You 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), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct Discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job application because of their religious views or because they might be gay.
- **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.
- **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.
- **Victimisation:** retaliation against someone who has complained or has supported someone's else's complaint about discrimination or harassment.
- **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.

5.4 Recruitment and Staff Selection

Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.

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.

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, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

5.5 Disabilities

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

5.6 Part-time and Fixed Term Work

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

5.7 Staff Training

All employees will be informed that an equality and diversity policy is in operation at their induction meeting on the first day of employment and are bound to comply with its requirements. They are informed of any subsequent modification. Additional training with regards to equal opportunities and diversity will be provided to all employees on an annual basis.

5.8 Breaches of this Policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you feel you, or another employee, has suffered discrimination, you should raise this with the HR Director. Alternatively, you can raise a complaint through our Grievance Procedure or Anti-harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

5.9 Monitoring and Evaluation

Provelio will regularly evaluate its services and the effectiveness of its Equality and Diversity Policy.

Monitoring will be carried out by Provelio to provide the data for this evaluation. For example, Provelio will ask job applicants for information about their ethnic origin, disability, marital status, age or other personal information. We will only do this to monitor and evaluate the policy's impact and effectiveness.

Provelio will be sensitive to groups and individuals and will have due regard for the principles of data protection when seeking information.