

EQUAL OPPORTUNITY & DIVERSITY & STRATEGY POLICY

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1. Introduction to Strategy

1.1 J. Freeley Ltd believes:

“A truly effective diverse organisation is one in which the differences individuals bring are valued and used”.

1.2 An effective response to diversity is at the heart of a modern organisation. A comprehensive diversity policy embraces key elements of best practice in employment and service delivery:

- Addressing inequality;
- Recognising and valuing difference;
- Promoting a skilled, diverse workforce;
- Meeting the needs of an increasingly diverse population; and
- Acting in accordance with legislation.

1.3 We believe there are five critical factors for improving equality and diversity:-

- **Commitment** - understanding the concept, owning and leading the work at the highest levels, and committing adequate resources.
- **Involving users** – consulting the actual and potential users of services about their needs and requirements.
- **Mainstreaming equality and diversity** – integrating equality and diversity into day to day work, and translating policy into practice.
- **Monitoring performance data** – ensuring that data gathering and analysis on equality and diversity is part of core performance monitoring systems.
- **Sustainability** – continuously keeping up the momentum to counter discrimination and promote diversity, reviewing performance and setting new targets.

1.4 We consider that the business case for promoting equality and diversity is overwhelming. Discrimination, however it occurs, will damage the relationship between J. Freeley Ltd and its customers, staff and partners. The promotion and awareness of equality and diversity issues will allow us to improve access to our services which should, in turn, increase levels of customer satisfaction.

1.5 Equality and diversity are at the core of J. Freeley Ltd vision and mission. Excellent services dependent on J. Freeley Ltd being an organisation where differences between individuals and communities are valued and everyone is treated with respect.

- 1.6 J. Freeley Ltd recognises that discrimination occurs at a number of levels in society:

Direct Discrimination – Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect Discrimination - is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Associative discrimination - is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and (according to guidance from the Government

Institutional Discrimination – this is best described with reference to the MacPherson Report on the Stephen Lawrence Inquiry.

“The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture and ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people”.

- 1.7 This definition, with appropriate amendments, powerfully describes other forms of institutional discrimination such as sex and disability discrimination.
- 1.8 Through the processes and specific actions set out in this strategy, J. Freeley Ltd is committed to eliminating unlawful discrimination.
- 1.9 This strategy describes the work that J. Freeley Ltd is doing to ensure that equality and diversity are promoted in the delivery of services and in employment.
- 1.10 J. Freeley Ltd strategic themes and aims to embrace equality and diversity into the organisation are as follows:
- **Leadership**
Aim: The J. Freeley Ltd Board and Senior Management Team to champion equality and diversity.
 - **Employment and Recruitment**
Aim: to ensure equality of opportunity for all staff and applicants.
Aim: to strive for organisational structures that reflect our community.

- **Procurement**
Aim: to ensure that our partners are aware of J. Freeley Ltd equality and diversity policy and their obligation to contribute to achieving this.
- **Harassment**
Aim: to ensure that minority groups feel confident to be employed by J. Freeley Ltd.
- **Training & Awareness**
Aim: to ensure that the Board, Contractors and staff receive training and information on equality and diversity.
- **Performance Monitoring**
Aim: to effectively measure, monitor and set challenging targets for equality and diversity to ensure continuous improvement.

1.11 Through the implementation of this strategy J. Freeley Ltd is committed to:

- Comply with the relevant legislative framework.
- Comply with the CRE Code of Practice.
- Actively work to prevent or eliminate discrimination and promote diversity and equality of opportunity in service provision and as an employer.

2. Legislation

2.1 Beyond J. Freeley Ltd own vision there is a range of legislation, regulation and good practice that provide a framework within which services must be delivered.

The Equality Act became law in October 2010. It replaces a raft of legislation and together with its codes of practices provides the framework for what we need to do to make our workplace a fair environment and to comply with the law.

J. Freeley Ltd as a responsible employer is totally committed to observing as far as possible The Human Rights Act 1998, The Equality Act 2010 and the Equality and Human Rights Commission's Codes of Practice for Employment, Equal Pay and Services, Public Functions and Associations.

2.2 The legislative framework consists of the following:

Equality Act 2010
Sex Discrimination Act 1986
Sex Discrimination (Gender Reassignment) Regulations 1999
The Gender Recognition Act 2004
The Gender Equality Duty (2007)
Race Relations Act 2003
Disability Equality Duty (2006)
Disability Rights Commission Act 1999
Human Rights Act 1998
Employment Act 2002
Employment Equality (Sex Discrimination) Regs 2005
Civil Partnership Act 2004
- (Amendment) Regulations 2007
Employment Rights Act 1996
Criminal Justice and Public Order Act 1994
Rehabilitation of Offenders Act 1974 and (Exceptions) Order 1975
Equal Treatment Directive 2002/73/EC.
The Asylum and Immigration Act 1996
[Immigration and Asylum and Nationality Act 2006 \(amendment 2008\)](#)

- 2.3 **The Sex Discrimination Act 1986** was introduced to ensure that people are not treated less favourably or harassed on the grounds of their gender.
- 2.4 **The Human Rights Act 1998** – There are sixteen basic rights in the Human Rights Act, all taken from the European Convention on Human Rights. They don't only affect matters of life and death like freedom from torture and killing; they also affect your rights in everyday life: what you can say and do, your beliefs, your right to a fair trial and many other similar basic entitlements.
- 2.5 **The Race Relations Act 2003.** This places a new positive general duty on public authorities to promote race equality and good race relations, as well as racial discrimination, in any of an authority's functions. It covers employment, the provision of goods, facilities and services.

3. Potential Areas for Discrimination

- 3.1 J. Freeley Ltd recognises that individuals or groups may suffer discrimination or disadvantage on the grounds of:

Race/ethnic or national origin/colour/nationality.

Equal Pay.

Sex (including transgender/transsexual).

Sexuality (homosexual, lesbian, bisexual, heterosexual).

Religion/belief/faith.

Cultural practice

Thought or political opinion.

Employment status.

Age.

Social Class.

Language.

Domestic circumstances (including caring and childcare responsibilities).

Financial circumstances.

Illness (such as HIV, AIDS and mental illness).

Disability.

Where they live.

Seeking asylum or refugee status.

Literacy.

- 3.2 We acknowledge that the above list is not exhaustive and that there are other forms of discrimination that should not be tolerated. We are committed to helping those who are disadvantaged, within the resources available, to ensure that we are a fair and equal employer and to ensure that all our customers have equal access to our services.

4. Harassment – Customers and Employees

AIM: To ensure that minority groups feel confident to be employed by J. Freeley Ltd or allow services to be provided.

4.1 Customer Harassment.

We recognise that vulnerable groups may experience harassment or discriminatory behaviour on a number of grounds especially race, ethnic or national origin, sex, disability and age. Any incidents of harassment or discrimination will be dealt with promptly and sensitively.

- 4.2 Systems will be developed to monitor race, ethnic or national origin, sex, disability and age in relation to all reported incidents. This information will be analysed and reviewed regularly in order to identify areas of discrimination or behaviour that may discourage certain groups from choosing J. Freeley Ltd and address them appropriately.

4.3 Employee Harassment.

Discriminative behaviour or harassment may also occur in the workplace in the form of direct, indirect or institutionalised discrimination. J. Freeley Ltd is committed to promote diversity and equality of opportunity in the workplace. Where discriminative behaviour or harassment is found to have taken place, employees will be dealt with in line with the company's disciplinary procedures.

5. Harassment – Customers and Employees

AIM: to ensure that our partners are aware of J. Freeley Ltd equality and diversity policy and their obligation to contribute to achieving this.

- 5.1 J. Freeley Ltd will ensure a common procurement practice for all contracts and supply chain agreements where by contractors, agents or suppliers and other organisations wishing to deliver contracts do so in accordance with the J. Freeley Ltd Equality and Diversity Strategy to facilitate continuous improvement against the Equality Standard. All goods, works and services sought by J. Freeley Ltd will cater for all potential user needs and satisfaction rates for users will be measured so as not to isolate or discriminate against any person or group.
- 5.2 J. Freeley Ltd will at pre tender stage, formally request copies of Company Equality and Diversity policy document. All Company policy documents will be assessed and scored to ensure a company ethos that mirrors that of J. Freeley Ltd and the company's ethics and experience can meet specific user needs.
- 5.3 J. Freeley Ltd will encourage partner organisations, suppliers, agents and consultants to be representative of the local population and will take steps to actively encourage involvement at every decision making stage from customer end uses, "hard to reach" groups and local community leaders.

6. Recruitment of Staff

AIM: To ensure equality of opportunity for all staff and applicants.

AIM: To strive for organisational structures that reflect our community.

6.1 J. Freeley Ltd is striving to be an equal opportunities organisation and as such opposes all forms of unlawful and unfair discrimination. Our aim is to recruit, train and develop our employees on the basis of their ability and the requirements of the job. We seek to have a workforce that is comparably representative of the local community.

- We aim to ensure that the best person for the job is appointed and that any unfair or unlawful discriminatory practices are eliminated. It contains essential information and advice for the selection panel incorporating the legal requirements and recommended good practice.
- We will monitor application forms to assess the response to advertisements and to ensure that no individual or group of people is being treated unlawfully or unfairly. This information helps to monitor the effects of policies relating to equality and diversity and assists us in the development of future best practice.

6.2 Employment and Recruitment

With regard to employment, this policy will apply to recruitment, training, pay, conditions of employment, work allocation, promotion and general welfare of staff and any other employee benefits.

7. Training and Development of Staff

AIM: To ensure that the board, area boards and staff are trained on J. Freeley Ltd approach to equality and diversity and have equal opportunity to access training.

AIM: The J. Freeley Ltd board and senior management team to champion equality and diversity.

7.1 Our workforce development policies are based on a fair assessment of abilities within a process that recognises, accepts and values individual differences. Staff will be selected for, or encouraged to participate in, particular development activities on the basis of their abilities, their needs and those of J. Freeley Ltd in relation to their current job or potential future jobs.

7.2 All managers involved in identifying development needs and opportunities will be required to ensure that there is no discrimination on arbitrary grounds and that selection is based on job related criteria. Workforce development is essential to the success of our Equality and Diversity Strategy and will be provided by:

- Ensuring that newly appointed employees are made aware of our strategy in their induction and are developed to an appropriate level.
- Ensuring that staff involved in recruitment and selection processes are given appropriate development which makes them familiar with the strategy and gives them an understanding of both direct and indirect discrimination.
- Ensuring that staff involved in the Individual Performance Review process are familiar with the strategy and its implications.

7.3 Board of Directors

Skills audits have been undertaken by Board Members and equality and diversity training is being provided as part of an ongoing training and development programme.

8. Procurement of Goods and Services

AIM: To ensure that our partners are aware of J. Freeley Ltd equality and diversity policy and their obligation to contribute to achieving this.

- 8.1 J. Freeley Ltd will ensure a common procurement practice for all contracts and supply chain agreements where by contractors, agents or suppliers and other organisations, wishing to deliver contracts do so in accordance with J. Freeley Ltd Equality and Diversity Strategy and action plan to facilitate continuous improvement against the Equality Standard. All goods, works and services sought by J. Freeley Ltd will cater for all potential user needs and satisfaction rates for users will be measured so as not to isolate or discriminate against any person or group.
- 8.2 J. Freeley Ltd will at pre-tender stage, formally request copies of Company Equality and Diversity policy document. All Company policy documents will be assessed and scored to ensure a Company ethos that mirrors that of J. Freeley Ltd and the Company's ethics and experience can meet specific user needs.
- 8.3 J. Freeley Ltd will encourage partner organisations, suppliers, agents and consultants to be representative of the local population and will take steps to actively encourage involvement at every decision making stage from customer end users, "hard to reach" groups and local community leaders.

9. Review

- 9.1 This document will be reviewed on an annual basis.

10. Statement of intent

- 10.1 The Directors accept that Equal Opportunity & Diversity Strategy issues are management responsibilities but they depend on the co-operation of all employees to make the policy successful to ensure as far as possible the Commission for Race Equality's Code of Practice for Employment.

It is the duty of all employees to comply with the Company Equal Opportunity & Diversity Strategy Policy at all times and to act responsibly and do everything that they can to promote issues.

The management of the company will monitor the operation of this policy. The organisation and arrangements of this policy will be displayed at each office, workshop, site and work place for inspection by all employees.

- 10.2 The board of Directors fully accept their responsibilities to monitor the operation of this policy and its effective implementation to their employees to observe, so far as is reasonably practicable, the Commission for Race Equality's Code of Practice for Employment at work and any other persons who may be affected by the company's work operations

Signed:  _____ (Director)

Printed: MICHAEL FREELEY (Director)

Dated: 6th January 2025

Review Date 5th January 2026