

Equality & Diversity Policy Version 1.0 16 February 2017

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2 STATEMENT

CapitaEnforcement believes that our success is a direct result of the experience and quality of our employees. We are, therefore, committed to focusing our employment procedures and practices on maximising the potential of each unique individual. We believe this is best achieved by developing our employee's talents, whilst recognising their differences.

By treating people fairly and equally and by accepting and embracing their diversity, we can also improve our market competitiveness, foster innovation, enhance our corporate social responsibility and create an inclusive and positive working environment for all employees.

It is the policy of CapitaEnforcement that no person acting on our behalf shall discriminate in any situation against another individual or group, directly, indirectly, because of age, sex, disability, gender, re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief and sexual orientation. CapitaEnforcement also endorses the principle that the workforce at each location should reflect, as far as is reasonably possible, the community within which it operates.

These principles apply to recruitment, selection, training, promotion, transfer, pay and benefits, performance appraisal procedures, in addition to all terms and conditions of employment.

3 SCOPE

This Policy covers all CapitaEnforcement employees, regardless of position or status, and to contractors and subcontractors.

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4 AIMS

- To ensure equality, diversity and inclusion in the workplace and community
- To offer fair treatment in every aspect of working life in CapitaEnforcement, from our written procedures through to every decision made
- To promote a culture where each employee and colleague is treated with respect and dignity and recognises the value that a diverse workforce can bring

TO ACHIEVE THESE AIMS, CAPITAENFORCEMENT COMMITS TO THE FOLLOWING:

- Ensure that the principles of this Policy are embedded in HR strategy and all policies and procedures are regularly monitored and reviewed.
- Provide awareness training and guidance to all employees and managers to ensure CapitaEnforcement commitment to diversity is known and understood. This will be achieved mainly through Diversity Awareness Training, e-induction, Managers Guide Training, our Employee Handbooks and Capita Connections.
- Monitor and measure diversity at every stage of employment to remove any direct, indirect, associative and perceptible discrimination.
- Challenge and investigate discriminatory behaviour and enforce the disciplinary procedure, when this is considered necessary.
- Support the Diversity Champions in promoting equality and diversity across CapitaEnforcement.
- Communicate and regularly review the positive initiatives that have been implemented and ensure ever-wider access to them.
- Support the communities in which we live and work to ensure that we are involved, accessible and socially responsible.
- Work with external groups and advisory bodies to keep up to date with market practise and how issues are dealt with.

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5 RECRUITMENT

CapitaEnforcement recruitment and selection procedure is based solely on the necessary and justifiable job requirements and the individual's suitability.

Job profiles and person specifications are drawn up for every post to be filled. Where posts are advertised externally, consideration is given to the most appropriate outlets to ensure that a wide range of potentially suitable applicants have the opportunity to apply.

Selection methods, including interviews, are conducted in accordance with documented and standardised procedures and checklists, designed to ensure that discrimination forms no part of the recruitment process. The objective is to make each appointment on the grounds of selecting the most suitable candidate for the post.

6 TRAINING AND DEVELOPMENT

Through its performance management procedure, CapitaEnforcement ensures that all staff are given an opportunity to take part in both job specific training and have an individual Performance Plan designed to promote their opportunities and career advancement within CapitaEnforcement. The appraisal process is carried out in accordance with clear and laid down criteria to ensure that its application is free from discrimination at every stage.

7 SELECTION PROCESS FOR PROMOTION

Whenever undertaking processes to select between groups of staff, for instance for promotion or in redundancy situations, CapitaEnforcement undertakes to ensure that a fair and consistent procedure is applied and that the selection criteria applied are free of discrimination and based on objective assessments of competence. Promotion opportunities are available to all of our employees on an equal basis.

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8 FLEXIBLE WORKING

CapitaEnforcement recognises the benefits of flexibility in working arrangements. Furthermore, we recognise the rights of all employees working under such arrangements to be treated fairly and consistently in comparison to full time, permanent employees and to be given the same opportunities for development. The treatment of pay and benefits for employees on flexible working arrangements is consistent with full time entitlements, wherever possible, these are provided on a pro rata basis.

9 DIVERSITY & PARTICULAR REQUIREMENTS

When a disabled person or anyone with particular requirements applies for a job in CapitaEnforcement, we always consider applications based on relevant skills, experience and knowledge. If you are disabled or have particular requirements, CapitaEnforcement will do its best to adapt the job and the workplace to meet the needs of individuals.

10 PAY AWARDS

CapitaEnforcement arrangements for determining employees' salaries are based on the principle of rewarding individual merit and of providing equality of pay and reward for all employees.

We operate a variety of pay review mechanisms, many of which incorporate participation of staff consultative forums, and these arrangements are designed to ensure that pay awards are based on objective criteria, free from discrimination and have due regard to the principle of equal pay for work of equal value.

11 GRIEVANCE AND HARASSMENT

While it is hoped and intended that most problems relating to employment in CapitaEnforcement can be resolved on an informal bases, the Grievance Procedure exists so that complaints of genuine concern can be dealt with equitably.

Any employee who believes he/she has been discriminated against should raise the matter under the Grievance Procedure, or where appropriate, the Anti-Harassment and Bullying Policy, or by using the Open Door Policy (where any employee can discuss any matter with his/her manager or another manager or any Director, in complete confidence).

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By having clear and well-publicised grievance and harassment procedures in place, CapitaEnforcement ensures that every opportunity is given to address any area or situation where discrimination is perceived to have arisen.

12 DISCIPLINARY PROCEDURE

CapitaEnforcement takes a serious view of any and all discrimination and breaches of this Policy are deemed as misconduct. Any such actions will be investigated as possible disciplinary offences and dealt with in accordance with the company's disciplinary procedures.

All staff have a shared responsibility to ensure that the Equality and Diversity Policy is adhered to and to promote dignity and equality of opportunity and outcome at work.

13 RESPONSIBILITIES

Whilst we all have a collective responsibility to ensure this Policy is successfully adopted, there are specific responsibilities with this area:

THE BOARD

The Board fully endorses this Policy and hold ultimate responsibility for reviewing and achieving its aims.

The Board recognises its role in being responsible and accountable for the development of diversity awareness in CapitaEnforcement and, as such, will lead by example.

MANAGERS

All managers are responsible for implementing and enforcing this Policy and ensuring that their teams and employees are aware of their responsibilities.

Managers should promote, respect and encourage each employee to reach their full potential and deal appropriately with any breach of this Policy.

Managers will ensure all employees are trained and made aware of their responsibilities under this Policy, through Diversity Awareness Training, e-induction, Managers' Guide Training, our Employee Handbook and Capita Connections.

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EMPLOYEES

All employees of CapitaEnforcement, at every level, have an individual responsibility for ensuring equality of opportunity and adherence to this Policy.

This can be achieved by respecting the right to work in an environment free from prejudice and discrimination, exhibiting the correct behaviours and challenging colleagues who fall short of these expectations.

14 HUMAN RESOURCES

This Policy is owned by the Compliance Director, who is responsible for its effective implementation and regular review.

The Compliance Team will continuously review all related policies, monitor employment practices and provide relevant advice and support to managers in championing diversity across the Company.

15 MONITORING

We continuously review this Policy, together with all of our employment policies and practices to maintain our focus on equality of opportunity.

To ensure that this Policy and other procedures are operating effectively, we will continue to monitor and measure the records of our employees, benchmark our performance as a Company and ensure that any patterns or trends are identified and resolved.

To achieve the aims and commitments of this Policy, the Compliance Team will ensure that further regular monitoring will take place. This will be in the form of:

- Quarterly statistics, broken down into diversity categories, to be reviewed by the Board. Where necessary, targets and performance management objectives will be set for specific areas in need of improvement, along with the necessary support and training.
- Monitoring of our central employee database, to ensure the application and effectiveness of this Policy
- Raising any issues or trends regarding diversity with the Directors

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16 DOCUMENT CONTROL

16.1 DOCUMENT HISTORY

Revision Date	Version Number	Summary of Changes	Author
16.02.2017	1.0	First Version	Natalie Knott

16.2 REVIEWERS

Name		
Adrian Bates	Compliance Director	

16.3 APPROVERS

Name		
Neil Smith	Managing Director	

16.4 DISTRIBUTION

Name	