



# **Equal Opportunities Policy and Procedures**

**October 2011**

## CONTENTS

### **Section A: Equal Opportunities policy**

- (1) Statement of Intent
- (2) Code of Practice
- (3) Code of Conduct
- (4) Definitions
- (5) Relevant legislation
- (6) Staffing;
  - i) Recruitment Selection and promotion
  - ii) Employment practice and Conditions of Service
  - iii) Training and Retraining
- (7) Board and Sub-Committees
  - a) Composition
  - b) Training
- (8) Harassment
- (9) Membership
- (10) Trainers, Consultants and contract workers
- (11) Publication and Publicity
- (12) Monitoring and Review of Policy
- (13) Confidentiality

## Section B: Equal Opportunities Practice

In attaining the standards of good equal opportunities practice, HCT Groups intention is to go further than what is legally required in the elimination of unfair discrimination on any of the grounds mentioned in the Statement of Intent. The standards referred to in this section are intended to be the minimum standards of good practice to be attained by HCT Group and are the standards it will encourage member organisations to attain.

### **CONTENTS:**

- (1) Implementation of policy
- (2) Staffing
- (3) Membership – Reflecting the communities we serve
- (4) Harassment – Addressing the effects of harassment
- (5) Administrative procedures
- (6) Equal Opportunities and overall organisational objectives
- (7) Allocation of resources to issues of Equality
- (8) Monitoring – Equal Opportunities Monitoring Group: Terms of reference

### **APPENDIX:**

Appendix to include:

- (i) Actual Disciplinary and Grievance Procedures
- (ii) Actual monitoring form
- (iii) HCT Group's Charter

## SECTION A

### EQUAL OPPORTUNITIES POLICY

#### (1) STATEMENT OF INTENT

HCT Group is committed to equality of opportunities both as an employer and a membership organisation.

In pursuant of our commitment, HCT Group adopts this document as its Equal Opportunities Policy and undertake to implement its contents through an Equal Opportunities Strategy which will permeate all areas of HCT Groups' activities.

HCT Group undertakes not to discriminate either directly or indirectly against individuals or groups of people on the basis of race, ethnic origin, nationality, gender, age, physical or mental disability, sexuality, marital status, religious beliefs, AIDS & HIV.

Although this document concentrates primarily upon equal opportunities in our own practices, it is HCT Group's intention to also actively advocate equality of opportunity within our member centres, not only in the services which they provide but also in their employment practices.

#### (2) CODE OF PRACTICE

##### INTRODUCTION

This Code of Practice sets out the procedures to be followed in implementing this Statement of Intent.

Although the continual changes in our society and the financial restraints under which HCT Group operates may mean that this aim may not be realised at all times, by creating and developing a specific programme, including a wide range of training opportunities, we can all work towards its acceptance as a goal.

Equal opportunities must go further than token gestures. It is a strategy which requires a great deal of effort in order to create an environment and atmosphere in which people and organisations not only feel that they are able to join, but, more importantly, are truly welcome to join.

This Statement of Intent, Code of practice, Policy and subsequent practice will be continuously monitored to ensure its effectiveness by the HCT Group's Management Committee.

### **(3) CODE OF CONDUCT**

All people will be treated with dignity and respect.

At all times people's feelings will be valued and respected. Language or humour that people find offensive will not be used e.g. jokes or terminology that could be sexist, racist, homophobic or derogatory to someone with a disability.

HCT Group will accept no harassment, abuse, or intimidation by or of staff, volunteers, executives, individuals and council members. Incidents or reporting of incidents of harassment, abuse, or intimidation will be treated seriously. If the matter cannot be resolved by way of an acceptable apology and an undertaking that the offence will not be repeated, the following action will be taken:-

- a) In a case involving staff, disciplinary action will be taken according to the procedure outlined in their conditions of service.
- b) In a case involving a member of the Board, the matter will be brought to the attention of the Chair of the Board of Directors who will arrange for it to be discussed at a meeting of the officers or Board of Directors whichever is the earlier. Although the officers may recommend a course of action the final decision will rest with the Board.

### **(4) DEFINITIONS**

#### **DIRECT DISCRIMINATION**

Direct discrimination takes place when a person is treated less favourably than others (in the same circumstances) on grounds such as race, colour, national or ethnic origin, gender, marital status, sexuality, disability or AIDS and HIV.

#### **INDIRECT DISCRIMINATION**

Indirect discrimination means applying a condition, or requirement which adversely affects one particular group considerably more than another, and cannot be strictly justified in terms of performing the job.

#### **RACIAL DISCRIMINATION**

Discrimination on the grounds of colour, race, nationality (including citizenship), ethnic or national origins. Race may also cover some religious groups (e.g. Sikhs).

#### **SEX DISCRIMINATION**

Discrimination on the grounds of a person's gender or marital status.

#### **DISCRIMINATION ON THE GROUNDS OF SEXUALITY**

A person who is discriminated against on the grounds of not being heterosexual, but either gay or lesbian.

#### **DISCRIMINATION ON THE GROUNDS OF DISABILITY**

This policy covers all people with disabilities who on account of injury, illness, or congenital deformity may be disadvantaged in obtaining or keeping employment, or in undertaking

work on their own account, of a kind which, apart from the injury, illness or deformity would be suited to their age, experience and qualifications.

### **AGE DISCRIMINATION**

Age discrimination is the process whereby negative assumptions about age impinge on employment-related and other decisions. Whilst restrictions with regard to age are sometimes necessary, it is recognised that age discrimination is wasteful and worsens the discrimination and disadvantages suffered on the grounds of race, gender, sexuality and disability.

### **RELIGIOUS DISCRIMINATION**

Religious discrimination in employment is the process whereby an employment decision is predicated on account of a person's religious observance belief or practice. Such a process is likely to increase the pressures which people from discriminated against groups are subjected to.

## **(5) RELEVANT LEGISLATION**

### **EQUALITY ACT 2010**

The intention of the Act is to harmonise the fragmented discrimination legislation which was in place before October 2010, but it also introduced some new restrictions.

The headings of age, disability (which includes mental health and people diagnosed as clinically obese), race, religion or belief, sex, sexual orientation, gender reassignment (people who are having or who have had a sex change, transvestites and transgender people), marriage and civil partnership, and pregnancy and maternity are now to be known as 'protected characteristics'.

There are now seven different types of discrimination:

- Direct discrimination: discrimination because of a protected characteristic.
- Associative discrimination: direct discrimination against someone because they are associated with another person with a protected characteristic. (This includes carers of disabled people and elderly relatives, who can claim they were treated unfairly because of duties that had to carry out at home relating to their care work. It also covers discrimination against someone because, for example, their partner is from another country.)
- Indirect discrimination: when you have a rule or policy that applies to everyone but disadvantages a person with a protected characteristic.
- Harassment: behaviour deemed offensive by the recipient. Employees can claim they find something offensive even when it's not directed at them.
- Harassment by a third party: employers are potentially liable for the harassment of staff or customers by people they don't directly employ, such as a contractor.
- Victimisation: discrimination against someone because they made or supported a complaint under Equality Act legislation.
- Discrimination by perception: direct discrimination against someone because others think they have a protected characteristic (even if they don't).

An employer can no longer ask a prospective employee about their health before offering them work, unless the employer can prove he is doing so to check whether the employee can carry out an essential task (such as heavy lifting for a removals company) or to monitor diversity. The employer can screen health once he has made a job offer  
'Health' means physical disabilities and mental health problems. This means an employer cannot ask how much time an employee has taken off work in their previous jobs in an interview.

An employer cannot treat someone unfavourably because of something connected to a disability. The standard example is spelling mistakes because of dyslexia.

Disabled people can now claim a particular rule or requirement disadvantages people with a certain disability.

An employer cannot discriminate against someone who is or has changed their gender (the 'gender reassignment' protected characteristic) - for example, if they take time off work for the process.

Mothers are allowed to breastfeed in public (on premises) - they can't be asked to go to a more private place.

Age is still the only protected characteristic by which an employer can justify direct discrimination, because the employer can argue that treating someone differently because of their age is allowed as long as it means the employer is doing it to meet a legitimate aim.

Tribunal judges can recommend changes to the practise of an entire business rather than just to the way an individual is treated.

Staff are now free to discuss wages with each other.

People making claims can now bring a 'dual discrimination' claim, meaning the tribunal assesses the impact of the two protected characteristics in conjunction ('young Polish') where before they considered each protected characteristic separately ('young' and 'Polish') - which often didn't reveal the full extent of the discrimination, as discrimination on two grounds is often worse than just one. However, only two characteristics can be combined, no more.

## **RACE RELATIONS ACT 1976**

Under the Race Relations Act it is illegal, except in cases of genuine occupational qualifications, to discriminate against any person directly or indirectly on the grounds of their race, in recruitment, promotion, training, conditions of employment or dismissal. Racial grounds cover race, colour, ethnic origin, nationality, citizenship and national origin. Groups defined by reference to those grounds are referred to as racial groups.

The Race relations Act applies to all racial groups. It is illegal to discriminate on racial grounds against a white English person as to discriminate against a Black person or an Irish person.

There is no legislation covering religious discrimination in Great Britain (England/Scotland/Wales) but discrimination on the basis of religion is illegal in Northern Ireland.

### **ACCESS TO TRAINING (RACE RELATIONS ACT)**

**“Positive Action”** under Section 38(1): An employer can provide access to facilities for training for particular work to employees of a particular racial group where:

- i. during the previous 12 months there was nobody from the racial group doing that work at that establishment; or
- ii. the proportion of persons of that racial group among those doing that work at that establishment is small in comparison with the proportion of that group among all those employed at the establishment; or
- iii. the proportion of persons of that racial group among those doing that work at that establishment is small in comparison to the population for the area from which the employer normally recruits for work at the establishment.

Section 38 cannot be used for positive action in employee recruitment and selection. However it can be used to provide preferential access to training for the person who is selected.

### **SEX DISCRIMINATION ACTS 1975 AND 1986**

Under the Sex Discrimination Acts it is illegal, except in cases of genuine occupational qualification, to discriminate against any man or women directly or indirectly in recruitment, promotion, training, conditions of employment or dismissal, on the ground of:

- a) their gender; or
- b) the fact that they are married.

The Sex Discrimination Acts apply to women and men. It is illegal to discriminate against a man as to discriminate against a woman.

### **ACCESS TO TRAINING (SEX DISCRIMINATION ACT)**

**“Positive Action”** under Section 4.48(1): An employer can provide access to training for particular work to employees of one sex only where:

- a) that work for the employer is done exclusively by members of one sex; or can provide such access only to members of the minority sex where:
- b) the number of persons of one sex (the minority sex) doing that work is small compared to those of the other sex doing it, or if this has been the case at some time during the previous 12 months.

Section 48 cannot be used for positive action in employee recruitment and selection. But it can be used to provide preferential access to training for the person who is selected.

## **DISABILITY DISCRIMINATION ACT 1995**

The act defines disability as a physical or mental impairment which has a substantial and long term adverse effect on a person's ability to carry out normal day-to-day activities. People who have a disability, and those who have had a disability but no longer have one, are covered by the Act.

Under this Act, discrimination occurs when a disabled person is treated less favourably than non-disabled persons in similar circumstances and the treatment is given for a reason relating to the person's disability while the same reason does not apply to the other non-disabled persons.

This Act also requires employers to make reasonable changes to physical features of premises and arrangements. Physical features cover the business premises, including fixtures and fitting, furniture and stairways. Arrangements cover recruitment practices, e.g. selection and interview process and the premises used for them; working terms and conditions, and how contractual agreements, transfers, training and other benefits are provided.

Contracting out work does not absolve an employer from liabilities of arrangements under this Act.

## **GENUINE OCCUPATIONAL QUALIFICATION**

Section 5(2)(d) of the Race Relations Act and Section 7(2)(e) of the Sex Discrimination Act say that where being of a particular racial group or gender is a genuine occupational qualification (GOQ) for a job, it is lawful for the employer to discriminate in favour of persons of that group:

- a) In recruiting for the job;
- b) In providing opportunities for training for the job;
- c) In providing opportunities for promotion or transfer to the job.

Being of a particular racial group or gender is a genuine occupational qualification where the worker provides persons of the racial group or gender in question with personal services promoting their welfare or education and those services can most effectively be provided by a person of the same racial group or gender.

## **(6) STAFFING**

### **RECRUITMENT, SELECTION AND PROMOTION**

All HCT Group posts (except those subject to legal exemptions, e.g. genuine occupational qualifications) will be open to all members of the society in which we live. Criteria and procedures will be reviewed to ensure that individuals are selected, promoted, and treated on their relevant merits and abilities.

Employment-related decisions with age bars or limitations may be considered only in terms of existing or new legislation or in line with existing or new contracts of employment.

Except where it is permissible as a genuine occupational qualification there will be no discrimination on the basis of religion.

## **EMPLOYMENT PRACTICES AND CONDITIONS OF SERVICE**

All staff regardless of their race, ethnic origin, gender, nationality, age, sexuality, disability, marital status or religious beliefs, shall enjoy the full protection of HCT Group's Equal Opportunities Policy and avail themselves of the procedures agreed as part of the Equal Opportunities strategy to achieve their full potential.

HCT Group will ensure that all service conditions do not discriminate against any particular person or group of persons, but provide for the varying needs of all the members of staff.

The mode of dress presentation of all employees shall be restricted only on the grounds of health and safety or where the Board decides that it would bring the organisation into disrepute.

Where cultural and religious beliefs conflict with the primary aims and objectives of HCT Group's Equal Opportunities Policy, the primary aims of the Equal Opportunities Policy shall prevail.

It is a condition of service that employees adhere to the Equal Opportunities Policy and failure to do so shall be cause for disciplinary measures to be taken.

## **TRAINING AND RETRAINING**

It is recognised that discrimination and prejudice will not cease merely as a result of policy decisions by HCT Group. Training is an important part of the strategies which are needed to change practices and attitudes. HCT Group will work with employees to ensure that the required changes are achieved. As part of this process, HCT Group will provide training for members of staff, which will increase their awareness of the discrimination and disadvantage suffered by various groups, and how to positively counter negative attitudes.

HCT Group further recognises the importance of employing people from groups which are discriminated against and that they be employed at all levels of the organisation including senior management. It will therefore ensure that where it is appropriate employees will be given special training and encouragement in order to achieve equality of opportunity, including retraining for women after a break in employment. No ceiling will be placed on the number of people selected for such training providing it falls within the financial constraints and organisational schedules of the organisation.

As HCT Group employees and volunteers are expected to comply with the Equal Opportunities Employment Practice training will be given to on all aspects of the policy.

HCT Group will make all reasonable endeavour to provide facilities for disabled people, to provide equal opportunities to training, career development, and promotion, including special training needs where the confines of its present office base allows.

Both young and older workers shall be encouraged to take advantage of opportunities for promotion as well as opportunities for training and development.

## **(7) BOARD & SUB-COMMITTEES**

### **COMPOSITION**

The Management Committees will be as representative as possible of HCT Groups membership and the communities which they service, and should as far as practicable include women and men, people of different age groups, white people, black people and people from minority communities, take note of the geographical spread of member organisations and people with disabilities. In particular, all groups should have, apart from exceptional circumstances, men and women, black and ethnic minority people and white people involved. Meeting arrangements should be such as not to discriminate against or discourage any potential members.

Once part of a committee, members will not be seen purely or exclusively as spokespeople for a minority group, but as full participants respected for their overall contribution.

Since the Board of Directors is elected by member organisations at our AGM, the Board once elected can use its powers of co-option as far as they allow to address imbalances within the elected membership so as to achieve the aims set out in 1. above.

### **COMMITTEE TRAINING**

HCT Group recognises the importance of training for its managing body and member organisations. It helps in the development of skills, understanding and potential as well as enabling people to work more co-operatively and effectively together. In line with this policy each new Board of Directors will be given a comprehensive induction programme. such training will also be available to members of appropriate sub-committees and working parties.

HCT Group will aim to provide Board members with training to enable them to:

- i. Understand their roles and responsibilities as employers and managers of a national voluntary organisation.
- ii. Help them increase their effectiveness and confidence as a managing body.
- iii. Consider and put into practice the equal opportunity implications of the HCT Group policy and their role in the implementation of that policy.
- iv. Develop new skills and understanding arising from their involvement in HCT Group.

## **(8) HARASSMENT**

HCT Group will not condone any form of harassment on any of the grounds listed in the Statement of Intent.

Harassment includes unreciprocated and unwelcome comments, looks, actions, materials, suggestions or physical contact that is found objectionable and/or offensive and may create an intimidating working environment.

Discrimination including harassment and victimisation on any of the grounds listed in the Statement of Intent, will be viewed as a disciplinary offence. Serious cases may constitute gross misconduct resulting in immediate suspension followed by summary dismissal by HCT Group.

HCT Group will not condone any harassment of any employee within HCT Group, whether these acts are committed by members of the public or by colleagues. Nor will HCT Group condone any acts of harassment by employees against members of the public. HCT Group is committed to its grievance, disciplinary and other Staff Code procedures which are intended to provide adequate redress.

## **(9) MEMBERSHIP**

### **ELIGIBILITY**

The Memorandum and Articles of Association define eligibility for membership of HCT Group. One of the objectives in HCT Group's Policy Statement is 'to expand HCT Group's membership among multi-purpose local organisations active on a range of issues and project areas, which meet the needs of different client groups'. HCT Group considers this objective an equal opportunities issue and will strive to achieve it.

### **MEETINGS & TRAINING EVENTS ARRANGEMENTS**

HCT Group is committed to encouraging members to participate in all aspects of the organisations work and at all events it organises. Therefore as a matter of standard practice HCT Group will always try to arrange meetings so that they are accessible to all eligible to attend and that the level of accessibility be publicised in advance.

### **TIMING**

Meetings will be scheduled to take account of the fact that some people wishing to attend may have child-care or care of dependent responsibilities. HCT Group will avoid whenever possible scheduling meetings at times that clash with major school holidays and religious festivals. New members to the Board of Directors should be provided with a questionnaire to establish the times which are most suitable for them to attend meetings.

### **VENUES AND FACILITIES**

Where possible, meetings will be held at premises that offer access and proper facilities for people in wheelchairs. Venues offering a meeting room with a hearing loop will be favoured.

- i. Where resources permit HCT Group will pay for signers, interpreters and translators where required.
- ii. Where possible all venues used will be suitable for all persons likely to attend in terms of accessibility of training rooms, bedrooms and social areas so that participants with mobility or other difficulties can take part on an equal basis.

iii. Venues which display racist, sexist or other offensive materials or encourage racist, sexist or other offensive behaviour will not be used.

iv. Participants will be asked in advance if they have special needs in terms of diet, childcare, etc., which may affect their involvement.

### **SERVICING OF MEETINGS**

When required and resources permit HCT Group will aim to accommodate the need for agendas and minutes to be produced in large print, on audio tape or in translation.

## **(10) TRAINERS, CONSULTANTS AND CONTRACT WORKERS**

All trainers, consultants and contract workers used by HCT Group will be asked to abide by and sign a Code of Practice for Trainers which adheres to our Equal Opportunities Policy.

The Code of Practice for Trainers will operate in conjunction with the HCT Group Training Policy which must be consistent with this Equal Opportunities Policy.

## **(11) PUBLICATIONS AND PUBLICITY**

### **CONTENT**

Published material must acknowledge the diversity of the multi-racial and multi-cultural society and approach it as a positive benefit and not as a source of problems. Specific reference to equal opportunities listed above must always be shown rather than be assumed to be self-evident.

### **LANGUAGE AND GRAPHICS**

Language and illustration materials will not be racist or sexist. HCT Group will strive to ensure that language and illustrations will portray positive images of the commitment that people of any racial origin and either gender make. Both language and illustrations will also always make clear the equal worth of individuals.

### **TRANSLATIONS**

All translated information will be prepared by professional mother-tongue speakers of the language into which it is to be translated and recorded on tapes.

Where resources permit HCT Group will aim to provide published material in translations.

## **(12) MONITORING AND REVIEW OF POLICY**

An Equal Opportunities Monitoring Group shall be formed. This group will report annually to the Board of Directors.

## **(13) CONFIDENTIALITY**

**Nothing said in this policy shall override the issue of confidentiality as laid down in the staff contract, where confidentiality is relevant to the issue at stake and to the contract or agreement between HCT Group and its employees or contractors.**

## SECTION B

# EQUAL OPPORTUNITIES PROCEDURES

### (1) IMPLEMENTATION OF THE POLICY

The Chief Officers will have ultimate responsibility for this policy.

All Chief Officers will be responsible for the implementation of the Equal Opportunities Code of Practice, as it applies to their work and responsibilities within HCT Group.

The Chief Executive will, through the normal line management structure, be responsible for ensuring that the Policy and Code of Practice are implemented throughout HCT Group.

The Board will set up an Equal Opportunities Monitoring Group.

The director will submit an annual report to the Equal Opportunities Monitoring Group to record progress on the implementation of the policy.

Other members of the Board and staff will be free to raise equal opportunities issues with the Equal Opportunities Monitoring Group including matters they wish to raise confidentially.

The Equal Opportunities Monitoring Group will meet as and when required but at least twice a year and prepare a report for the AGM on progress implementing the Policy and recommend any changes considered necessary to HCT Group's policies, the Code of Practice or the Constitution.

### (2) STAFFING

**Advertising and Targeting:** HCT Group will advertise in national newspapers and local newspapers where appropriate as well as selected papers serving minority communities, stating clearly the requirements for the job as well as the qualifications and experience required of the job holder. The salary scale or band must also be clearly stated. The advertisement could contain a statement encouraging particular sections of society which are underrepresented within HCT Group to apply. At the bottom of the advertisement, HCT Group will state that it is an equal opportunities employer.

In the event of a short-term vacancy (e.g. a secondment or sabbatical leave) for a period of less than six months, advertising will be through the mailings of partner agencies and to all HCT Group members. Where the vacancy is between six months and a year, the advertising will in addition to those mailing use appropriate based outlets.

All posts which are for more than a year or where it is likely to extend beyond a year must be advertised nationally.

Where the position falls under a positive action programme or where a genuine occupational qualification applies, HCT Group will state it on the advertisement. Where either of the above exemptions apply, HCT Group will also advertise in newspapers and magazines associated with the particular group preferred (e.g. The Voice, Pink Paper, Asian Times).

All job application packs must contain an equal opportunities monitoring form.

**Interviews:** HCT Group will ensure that candidates are informed well in time of the date of the interview. Premises used for interviews will have facilities, wherever possible to cater for the needs of people with disabilities. HCT Group will also ensure that members of the interview panel will have received training in or possess satisfactory knowledge of equal opportunities. Selection will be based purely on merit. No exemptions, privileges or disadvantages will be taken into consideration at this stage.

Upon appointment, HCT Group will supply all employees with the letter offering the job, and a written statement of the conditions of service. In addition, all employees will receive a copy of the HCT Group contract of employment for reference.

**Office environment:** HCT Group will provide an office environment for employees which is conducive to a health, safe, efficient atmosphere. To achieve this, HCT Group will aim to provide adequate facilities for disabled and infirm employees and volunteer workers. HCT Group will also uphold the health and safety procedures as contained in its Health and Safety policy.

### (3) **MEMBERSHIP**

**Recruitment procedures:** New members are recruited mainly by the Network Development Officer but it is the responsibility of staff and members to encourage organisations with which they are in contact to become members. It is therefore essential that all are fully briefed on the current criteria for eligibility, and any changes which are subsequently made.

**Practice in member centres:** HCT Group will encourage member organisations

- to develop equal opportunities policies and practices appropriate to their individual circumstances.
- to work towards a make-up of their membership, staff and managing bodies which reflects the communities they serve and to take positive steps to involve women, black and ethnic minority people, young people and people with disabilities.
- to provide a service which does not ignore, unfairly discriminate against, discourage, or treat with disrespect, anyone on the grounds listed in the Statement of Intent.
- to understand the ways in which they discourage or effectively exclude people from their service or centre and how to take steps to remedy the situation.

- to ensure that they are as fully accessible as possible (e.g. for wheelchair users or people on walking frames) and that this fact is included in publicity output.
- to acquire and use good employment practices, to follow employment practices set out in this document.
- to follow the practices set out in Section 11 of the HCT Group Equal Opportunities Policy with regard to publications and publicity and ensure that their publicity and information materials do not by the images and language chosen imply that centres are aimed only at one section of the community (e.g. men, white people, people without children, older people, etc.). the same will apply to items displayed on walls and notice boards of centres.
- to undertake translations where necessary where necessary.
- to adopt terminology that is not gender specific (e.g. Chair) to reflect their equal opportunities policy.
- to adopt and adhere to the Code of Conduct.
- to monitor the progress they make in introducing and implementing equal opportunities policies and practices.

HCT Group fully expects its member organisations to practice equal opportunities in line with the above principles and may ask to see evidence of such practice from time to time.

#### **(4) HARASSMENT**

HCT Group will neither condone the harassment of any employee in any form within the organisation, whether these acts are committed by members of the public or by colleagues nor will it condone any acts of harassment by employees against members of the public. HCT Group is committed to its grievance, disciplinary and other staff code procedures which are intended to provide adequate redress.

As an organisation committed to equal opportunities, HCT Group appreciates that harassment can affect people in different ways. Where harassment has occurred, HCT Group will take steps deemed appropriate by the head of agency to protect the victim of such harassment within their work environment. This could be done by redefining the working relationship between the perpetrator and victim or by relocating the perpetrator (the victim should only be relocated if it is their stated preference). The situation will then be monitored until a satisfactory outcome is reached.

Where the effects of harassment are manifestly detrimental to the well-being of the victim, HCT Group could consider granting an appropriate period of compassionate leave. This will be at the discretion of the head of agency or anybody acting in that capacity.

**(5) ADMINISTRATIVE PROCEDURES**

HCT Groups' staff contract which contain details of the grievance / disciplinary procedures, maternity / paternity leave, Health and Safety regulations etc. will be given to every member of staff as a matter of utmost importance.

**(6) EQUAL OPPORTUNITIES AND OVERALL ORGANISATIONAL OBJECTIVES**

The Board of Directors, through the head of agency will ensure that the organisational objectives of HCT Group have an Equal Opportunities ethos. While business decisions may not always bear hallmarks of Equal Opportunities, HCT Group must ensure that business policy decisions do not place a barrier on the path of Equal Opportunities even if such decisions do not blatantly contradict the Equal Opportunities Policy. Equal Opportunities must therefore be interwoven with other policies of the organisation.

**(7) ALLOCATION OF RESOURCES**

It is the responsibility of the Board of Directors to ensure that adequate resources are made available to issues relating to Equality. In carrying out this task, the Board shall be advised by the Equal Opportunities monitoring group and the Director.

**(8) EQUAL OPPORTUNITIES MONITORING GROUP – TERMS OF REFERENCE**

The Equal Opportunities Monitoring Group will be responsible for the monitoring of HCT Groups' equal opportunities policy and practice.

The membership shall be made up of:

2 members from the Board, 2 members from membership organisations, additionally the group will have the power to co-opt up to three other members 1 of whom may be a union representative if thought appropriate.

The group's role shall be to monitor the implementation and effectiveness of the policy and to discuss the development of equal opportunities within HCT Group.

This Group will meet at least twice a year and will be able to request relevant statistical and other information as given below in order to enable it to make proper assessments. The Director shall submit an annual report to the Group in June of each year giving the position on the following as of 31<sup>st</sup> March of that year:-

- a. The current staff profile showing a breakdown by grade of staff, by race, by ethnic origin, by sex, by age and by disability and providing comparisons with previous years.
- b. The records of selection procedures for recruitment showing the numbers of candidates involved at each stage by race, by ethnic origin, by sex, by age and by disability.

- c. A report on action taken by all those responsible for particular sections of the Work Programme in incorporating equal opportunity strategies in their areas of work.
- d. The breakdown of new member organisations and membership of committees by race, by ethnic origin, by sex, by age and by disability.
- e. The breakdown of current members through a profile of members by staff.
- f. A profile of the Board of Directors, Sub-committees and working parties showing a breakdown by sex, by ethnic origin, by age and by disability.
- g. Statistical information on telephone / letter enquiries with a breakdown of what organisation makes the enquiries and about what.
- h. An analysis of the participants at all HCT Group training events by sex, ethnic origin, age, disability and certain other factors which may be agreed from time to time.
- i. A report on training in equal opportunities policy and practice received by Board and sub-committee members and staff, either through events organised within HCT Group or through participation in external programmes.
- j. A review of the current Conditions of Service for staff.
- k. A report on progress in all action being taken to achieve equal opportunities and recommendations for future action.

The Equal Opportunities Monitoring Group will report annually to the Board of Directors reviewing progress in implementing the Policy and recommending any changes considered necessary to HCT Group's policies, the Code of practice, Standing Orders or the Articles / Memorandum of Association.