

DISABILITY POLICY

Policy statement relating to employees

The Company is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally, regardless of whether or not they have a disability. Discrimination against disabled people is unlawful under the **Disability Discrimination Act 1995**. This includes less favourable treatment on the ground of a disabled person's disability, harassment because of a disability and/or a failure to make reasonable adjustments.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to disability. The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's disability. The Company will not condone any form of harassment on the ground of disability, whether engaged in by employees or by outside third parties who do business with the Company, such as contractors, suppliers, clients or customers.

Employees have a duty to co-operate with the Company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment on the ground of disability. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation on the ground of a person's disability. Serious breaches of this disability policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination on the ground of disability.

Employees should draw the attention of their line manager to suspected discriminatory acts or practices or suspected cases of harassment relating to a disabled person's disability. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment on the ground of disability or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.

Policy statement relating to customers and clients

The Company is also fully committed to a policy of treating its customers and clients equally, regardless of whether or not they have a disability. Discrimination against disabled customers and clients is again unlawful under the Disability Discrimination Act 1995. In this case, this includes less favourable treatment for a reason related to a disabled customer's disability, a failure to make reasonable adjustments to the way in which the Company delivers its services so that disabled customers and clients can use them and/or a failure to alter physical features of premises that make it impossible or unreasonably difficult for disabled customers or clients to make use of its services.

Employees have a duty to co-operate with the Company to ensure that this policy is effective in ensuring that its disabled customers and clients do not experience less favourable treatment for a reason related to their disability. Action will be taken under the Company's disciplinary procedure

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against any employee who is found to have committed an act of improper or unlawful discrimination against a disabled customer or client. Employees should also draw the attention of their line manager to suspected discriminatory acts or practices relating to its disabled customers and clients.

Recruitment, advertising and selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of experience, abilities and qualifications. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will encourage applications from all suitably qualified and experienced people. When advertising job vacancies, the Company will, as far as reasonably practicable, avoid prescribing any unnecessary requirements which would exclude disabled job applicants. In addition, where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a disability.

The selection process will be carried out consistently for all jobs at all levels. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question after adjustments have been made (see below). A disability will not in itself justify the non-recruitment of a job applicant. In addition, the Company will have regard to its duty to make reasonable adjustments to work arrangements or to work premises in order to ensure that a disabled job applicant is not placed at a substantial disadvantage in comparison with persons who are not disabled.

Adjustments

The Company recognises that equal opportunities for disabled employees may mean adjustments to the work arrangements or to work premises. These adjustments will be made wherever reasonable and within a reasonable time frame. On starting work, a disabled employee's manager will be responsible, in consultation with the employee, for ensuring such reasonable adjustments are made to working arrangements or to the workplace itself as are required to enable the employee to work safely and effectively. Where the manager does not have the relevant knowledge or experience to make reasonable adjustments, an internal or external specialist may be consulted. However, the expertise of the disabled employee concerning his or her own disability will always be recognised. Reasonable adjustments may include, but are not limited to, re-allocation of job duties, altering hours of work, permitting absence during working hours for treatment or rehabilitation, providing specialist equipment and training, providing supervision, remote working or redeployment to a suitable alternative vacancy.

Where, during the course of employment, a disabled employee recognises the need for a reasonable adjustment to his or her working arrangements or to a physical feature of the work premises, he or she should discuss this requirement with their manager. The manager will then determine the appropriate action.

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Training and promotion

The Company will train all relevant managers in the Company's policy on equal opportunities and in helping them identify discriminatory acts or practices or acts of harassment or bullying on the ground of disability. Managers will be responsible for ensuring they actively promote equal opportunity for disabled employees within the departments for which they are responsible.

The Company will also provide training to all employees to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment free of bullying and harassment on the ground of disability.

Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice. When a worker with a disability appears to be excluded from access to promotion and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful disability discrimination.

Terms of employment, benefits, facilities and services

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the ground of disability.

Harassment

It is against the Company's policy for any employee to harass another employee on the ground of his or her disability. Harassment occurs where a person engages in unwanted conduct which has the purpose or effect of violating the other's dignity at work or creating an intimidating, hostile, degrading, humiliating or offensive work environment for the other person. Harassment may comprise intentional bullying which is obvious or violent but it can also be unintentional or subtle, such as the use of nicknames or teasing. It is for the disabled complainant to decide for him or herself what they regard as offensive.

Reporting complaints

All allegations of discrimination or harassment on the ground of disability will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from employees who are disabled.

With cases of harassment, while the Company encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical.

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If you wish to make a complaint of discrimination or harassment on the ground of disability, you should follow the following steps:

1. First of all, report the incident of discrimination or harassment to your manager. If you do not wish to speak to your manager, you can instead speak to (insert details).
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2. Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.
3. All allegations of discrimination or harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a witness statement setting out the details of your complaint. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation.
4. Once the investigation has been completed, you will be informed of the outcome and the Company's conclusions.
5. The Company is committed to taking appropriate action with respect to all complaints of discrimination or harassment on the ground of disability which are upheld.
6. You will not be penalised for raising a complaint, even if it is not upheld, unless your complaint was both untrue and made in bad faith.

Alternatively, you may if you wish use the Company's grievance procedure to make a complaint.

Any employee who is found to have discriminated against or harassed another employee on the ground of disability in violation of this policy will be subject to disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

Monitoring equal opportunity and dignity at work for disabled employees

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved for disabled people.