

## NBV Enterprise Solutions Ltd and Subsidiaries Equality Policy

NBV is committed to providing a working environment in which employees are able to realise their full potential and to contribute to its business success irrespective of the following protected characteristics:

- Age
- Disability
- Gender Reassignment
- Race (including colour, nationality and ethnic or national origins)
- Religion or Belief (or no belief)
- Sex
- Sexual Orientation
- Marriage & Civil Partnership
- Pregnancy & Maternity

and Part Time Status

This is a key employment value to which all employees are expected to give their support.

In order to create conditions in which this goal can be realised, NBV is committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes throughout the organisation. NBV expects employees to support this commitment and to assist in its realisation in all possible ways.

Specifically, NBV aims to ensure that no employee or candidate is subject to unlawful discrimination, harassment (including third party harassment) or victimisation as detailed and defined below. This commitment applies to all aspects of employment, including:

- recruitment and selection including
  - advertisements
  - job descriptions
  - interview and selection procedures
- training
- promotion and career development opportunities
- terms & conditions of employment and access to employment related benefits and facilities
- grievance handling and the application of disciplinary procedures
- selection for redundancy

Equally NBV is committed to providing a business environment in which **all** clients, licensees, learners and visitors are able to flourish. To this end NBV will not tolerate any type of discrimination on its premises or at any NBV event, workshop or function.

NBV is committed to equality of opportunity. Should any individual using NBV premises or services have any special requirements or need additional assistance from NBV we ask that the individual notifies us in advance so that we can work with them and do everything reasonably practicable to accommodate them.

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## **Discrimination, Harassment and Victimisation**

### **Direct Discrimination**

Direct discrimination occurs when one individual is treated less favourably than another because he/she has a protected characteristic (see list above) or because of his/her part time status.

### **Discrimination by Association**

Discrimination by association occurs when an individual is discriminated against because he/she associates with someone who has a protected characteristic (see list above excluding Marriage & Civil Partnership and Pregnancy & Maternity).

### **Discrimination by Perception**

Discrimination by perception occurs when an individual is discriminated against because he/she is perceived to have a protected characteristic (see list above excluding Marriage & Civil Partnership and Pregnancy & Maternity).

### **Indirect Discrimination**

Indirect Discrimination occurs when a company has a condition, rule, policy or practice that applies to everyone but particularly disadvantages those who have a protected characteristic (see list above excluding Pregnancy & Maternity) or work part-time. The exception to this is where the condition, rule, policy or practice meets a legitimate business aim and there is no alternative means available.

### **Harassment**

Harassment is "unwanted conduct related to a relevant protected characteristic" (see list above excluding Marriage & Civil Partnership and Pregnancy & Maternity) "which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual."

An employee need not possess the relevant protected characteristic in order to complain of harassment, nor need the harassment be directed at him or her.

### **Third Party Harassment**

Third Party Harassment is harassment of employees by an individual who is not part of the organisation such as a customer or client.

The Equality Act 2010 makes the employer liable for Third Party Harassment when the harassment has occurred on at least two previous occasions and the employer has been made aware of the harassment but has not taken reasonable steps to prevent it from happening again.

### **Victimisation**

Victimisation occurs when an employee is treated badly because he or she has made or supported a complaint or raised a grievance under the Equality Act, or because they are suspected of doing so. An employee is not protected from victimisation if he or she has maliciously supported an untrue complaint.

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## **How Complaints of Unlawful Discrimination, Harassment or Victimisation will be handled**

These are often complex matters, and there is no single way of dealing with every suspected or alleged instance. In some cases employees may be able to deal satisfactorily with an issue by raising it with their Line Manager.

If an employee wishes to make a formal complaint he or she should use the Company's **Grievance Procedure** which is set out in the **Employee Handbook** on the QMS.

If a client, licensee, learner or visitor wishes to make a formal complaint he or she should follow the **NBV Complaints Procedure**, a copy of which is available from NBV staff and also on the NBV website [www.nbv.co.uk](http://www.nbv.co.uk)

**The Company will treat seriously all allegations of unlawful Discrimination, Harassment or Victimisation.**

### **If an Employee is Accused of Unlawful Discrimination or Harassment**

If an employee is accused of unlawful discrimination or harassment, the Company will investigate the matter fully.

In the course of the investigation the employee will be given the opportunity to respond to the allegation and provide an explanation of his or her actions.

If the Company concludes that no unlawful discrimination or harassment has occurred, this will be the end of the matter.

If the Company concludes that the claim is false or malicious the complainant may be subject to disciplinary action.

If on the other hand the Company concludes that the employee's actions amount to unlawful discrimination or harassment he or she may be subject to disciplinary action, up to and including summary dismissal for gross misconduct.

### **Monitoring**

NBV will not tolerate unlawful discrimination or harassment of any kind in the working environment and will take positive action to prevent its occurrence.

In this connection the NBV will monitor its policies and will implement changes in order to improve them as social attitudes and legislation change. This commitment applies to all the NBV's employment policies and procedures, not just those specifically concerned with equal opportunities.

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