

Equal Opportunity Policy

2024

1. POLICY STATEMENT

BHA Medical Limited recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics).

Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give their best.

We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services.

This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

2. OUR COMMITMENT

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.

- Training, development and progression opportunities are available to all staff.
- To promote equality in the workplace which we believe is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management.
- The policy will be monitored and reviewed regularly.

3. WHAT IS DISCRIMINATION?

Under UK employment law, there are a number of characteristics relevant to an individual who is covered by the policy that must not unfairly be considered (if accounted for at all) in decisions relating to any aspect of their working life.

These characteristics are called ‘protected characteristics’ and they are listed immediately below:

- Age
- Disability
- Gender reassignment
- Marital or civil partnership status
- Pregnancy or maternity
- Race (which includes colour and ethnic/national origin)
- Religion or belief
- Sex
- Sexual orientation

If employment-related decisions are made about an individual on the basis (whether wholly or partially), of any of these protected characteristics, it is almost inevitable that unlawful discrimination will have taken place.

The sorts of actions that would fall into this category of unlawful and prohibited initiatives, include (but aren’t limited to) those set out below. These actions need not be intended or directly committed by someone (indirect responsibility may be sufficient for someone to have unlawfully

discriminated) and an omission or failure to do something may be just as culpable as a positive action.

We will not tolerate their practice by anyone within our business:

3.1 Direct discrimination

When someone with a protected characteristic is treated less favorably than somebody else has or would have been in identical circumstances. An example of this would be where an applicant for a job is rejected on grounds of their racial background. Further examples would be where a pregnant employee, or one with young children, is not promoted.

3.2 Indirect discrimination

When a group of people with one of the protected characteristics is disadvantaged by a provision, criterion or practice that is applied to all staff (unless the treatment may be justified for a good business reason). Examples of this would be:

- a) Insisting, without good reason, that all staff must work full time, (which indirectly discriminates anyone with child-care responsibilities, women in particular)
- b) Requiring all staff to work onsite and refusing to consider a request to work remotely or under alternative conditions, like flexible hours to avoid commute times, which could disadvantage someone with a disability or a phobia (e.g. someone who suffers claustrophobia or panic attacks on commuting routes)
- c) Refusing to provide a room for reflection and prayer, which would discriminate against individuals practicing certain faiths
- d) Dismissing or not employing a woman because she is pregnant or of child-bearing age

3.3 Harassment

Covers hostile, humiliating, degrading, intimidating or similarly offensive treatment or conditions to which an individual with one or more protected characteristics is subjected. Any such actions deprive an individual of their dignity and violate them. We draw no distinction between actions that may be labelled as 'joking' and not intended to cause offence, and those that may have been more direct and premeditated in their delivery. So, for example, in line with legal definitions, reflecting general standards of decency, we will regard any of the following as falling within the definition of harassment:

- Making lewd comments and/or displaying pornographic material.
- Calling someone unkind, derogatory or otherwise unwelcome names or nicknames.
- Making insensitive jokes, whether about someone directly, or the content of which would be evidently offensive to anyone with a protected characteristic.
- Excluding colleagues and/or making them feel that they have no option but to exclude themselves.

3.4 Victimization

This has a particular meaning under UK employment law, and it is narrower than an ordinary dictionary definition, covering the situation only where:

- a worker has complained of discrimination (or harassment),
- or has supported a fellow worker in making a complaint about these concerns,

and has then suffered reprisals from others, including those responsible for that worker's employment prospects and working conditions.

The UK's employment law also identifies other actions that can be unlawful under the equal opportunity's legislation. Examples of these include:

- Failing to make reasonable adjustments to minimize certain disadvantages suffered by a disabled employee (or job applicant).
- Instructing another person (or applying pressure on them) to discriminate.
- Knowingly assisting somebody else when they carry out a discriminatory act.
- Discriminating against somebody believed to have a protected characteristic, whether or not they actually do, or because they associate with a third party who does.

4. RESPONSIBILITIES OF MANAGEMENT

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Directors / Group Compliance Officer / Managers and will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each manager will ensure that:

- all their staff are aware of the policy and the arrangements, and the reasons for the policy.
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible.
- proper records are maintained.

Head Office will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic departmental audits.

5. RESPONSIBILITIES OF STAFF

Responsibility for ensuring that there are no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- comply with the policy and arrangements.
- not discriminate in their day-to-day activities or induce others to do so.
- not victimize, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- inform their manager if they become aware of any discriminatory practice.

6. THIRD PARTIES

Third-party harassment occurs where a BHA Medical Limited employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. BHA Medical Limited will not tolerate such actions against its staff, and the employee concerned should inform their manager / supervisor at once that this has occurred. The Company will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

7. RELATED POLICIES AND ARRANGEMENTS

All employment policies and arrangements have a bearing on equality of opportunity. The Company policies will be reviewed regularly, and any identified discriminatory elements removed.

8. RECRUITMENT, PROMOTIONS AND IDENTIFYING CANDIDATES FOR OTHER OPPORTUNITIES

In any selection process that we use within our business, whether we're selecting interviewees for job opportunities, offering jobs, identifying individuals for promotion or considering other opportunities or necessities (like redundancy situations), we will apply a rigorous, objective selection process using non-discriminatory criteria, as far as possible.

We emphasize here, however, that both direct and indirect age discrimination may be justified and lawful, if the less favorable treatment, criterion or practice amounts to a proportionate means of achieving a legitimate aim. A legitimate aim must relate to a genuine business need on our part that is not related to age discrimination itself. For example, a legitimate aim potentially justifying age discrimination might include:

- Economic factors such as business needs and efficiency.
- The health, welfare and safety of the individual concerned (including the protection of young people or older workers).
- The particular training requirements of the job.

All job adverts and opportunity announcements will be:

- Discussed with and signed off by the HR Manager, one of whose responsibilities is to ensure that any advert is compliant with this policy.
- Located and/or circulated so as to reach as wide and diverse a pool of interested candidates as possible, and
- Worded so as to encourage, as far as possible and reasonable, applications from individuals of all characteristics to apply – or, at the very least, so as not to discourage any individuals with protected characteristics from applying.

There may be circumstances where some indication of required skills (that do discriminate) is justified and where self- deselection is inevitable, for example, where the job vacancy is for a window cleaner who works at height, wearing abseiling harnesses. The job advert might specify that interested candidates must be willing and capable of abseiling to be considered for the job.

Staff involved in interviewing and or any other part of our recruitment process, will never ask a job applicant about their health, attendance record, or whether they have a disability before making a job offer to them (except in very limited circumstances).

We can ask someone if they have any particular needs or requirements with which you can assist if they are coming to meet you for an interview. In certain limited cases, it may also be permitted to make a job offer conditional on a successful medical examination.

During interviews or other interactions with candidates for a role, we will not ask anything that might infer a bias against any candidate with one or more protected characteristics. So, for example, asking a candidate if they are married, intend to have children (or any more children), or whether their religion permits them to work at weekends, are strictly no-go zones.

If we are ever in doubt about what can or must not say, or if we believe that a particular job vacancy needs a medical examination as part of the recruitment or onboarding process, we must check the position with the HR Manager.

9. RIGHTS OF DISABLED PEOPLE

The Company attaches particular importance to the needs of disabled people.

Under the terms of this policy, managers are required to:

- make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours (NB: managers are expected to seek advice and guidance from external agencies where appropriate to maintain disabled people in employment).
- include disabled people in training / development programs.
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

10. EQUALITY TRAINING

A series of regular briefing sessions will be held for staff on equality issues. These will be repeated as necessary. Equality information is also included in induction programs.

Training will be provided for managers on this policy and the associated arrangements. All managers who have an involvement in the recruitment and selection process will receive training.

11. MONITORING

The Company deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly, a monitoring system will be introduced to measure the effectiveness of the policy and arrangements.

The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnic origin, sexual orientation, religion / beliefs, grade and length of service in current grade. Information regarding the number of staff who declare themselves as disabled will also be maintained.

There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training / development opportunities affect equal opportunities for all groups.

We will maintain information on staff who have been involved in certain key policies: Disciplinary, Grievance and Bullying & Harassment.

Where appropriate equality impact assessments will be carried out on the results of monitoring to ascertain the effect of the Company policies and our services / products may have on those who experience them.

The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

If monitoring shows that the Company, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the Company, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, Company policies and practices as well as consideration of taking legal Positive Action.

12. HANDLING BREACHES AND ENFORCEMENT

We take all allegations of breach and any breaches that we discover very seriously. All allegations and/or suspicions of breach will therefore be thoroughly investigated.

If you wish to complain or raise an allegation of breach (or potential breach) under the policy, you should contact your line manager, HR manager or Compliance Officer as soon as possible. If you want to take formal action, you will need to follow our grievance procedure and read our policy on harassment and bullying.

Anyone raising a concern about matters covered by this policy, who does so in good faith, will have our full support and co-operation in getting to the bottom of what has happened and any appropriate action that needs to follow on from that examination. This will be the case regardless of our conclusions and including where we determine that the allegation was mistakenly made. There will never be any reprisals against those who genuinely have, or consider that they have, valid grounds to bring concerns about discrimination to our attention.

However, complaints made in bad faith, for whatever reason (including where this is an attempt to avoid or to deflect disciplinary action), will be treated as misconduct and may lead to a dismissal for gross misconduct.

We will also take prompt disciplinary action against you if we discover that you have harassed or discriminated against anyone else in breach of this policy. If we conclude that your behavior amounts to gross misconduct, we will be within our rights to dismiss you without notice and with no payment in lieu of that notice.


13. GRIEVANCES / DISCIPLINE

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance or Harassment Procedures.

Discrimination and victimisation will be treated as disciplinary offences, and they will be dealt with under the Company Disciplinary Procedure.

14. REVIEW

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Directors of BHA Medical.

Equal Opportunity Policy approved by:	
Signature:	
Full Name:	Michael Hough
Position:	Director
Year:	2024