

EQUALITY, DIVERSITY AND INCLUSION POLICY

1. Policy

Oxford International is firmly committed to equality and diversity in all areas of our work. As part of their responsibilities under the Equality Act 2010, Oxford International has a duty to promote equality of opportunity as well as tackling unlawful discrimination (whether direct and/or indirect and this also incorporates victimisation). We believe that diversity is a means to achieve our ambitions. Equality and diversity is about outreach, inclusion and service delivery as well as the people we employ and involve in our work.

We believe that we have much to learn and profit from diverse cultures, experiences and perspectives, and that diversity will make our organisation more effective in meeting the needs of all our stakeholders. It is therefore everyone's responsibility, not just the responsibility of directors and managers, to make sure that diversity and inclusion is promoted throughout Oxford International.

It is the policy of Oxford International to treat all employees, service users, contractors and job applicants fairly and equally, regardless of their age, disability, race, religion and belief, gender and sexual orientation. Furthermore, Oxford International will ensure that no requirement or condition will be imposed without jurisdiction which could disadvantage individuals purely on any of the above grounds.

Under the Equality Act 2010 we will ensure that the following characteristics are protected:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual Orientation

Training is available via the company's usual provider, iHASCO, on Equality and Diversity in the workplace. All Oxford International employees should complete this training as part of our commitment to promoting equality and diversity at work, and eliminating discrimination as far as is reasonably practicable.

This policy can be obtained from HR at any point and is available through your Employee Self Service platform.

2. Aims and Scope

The overall aim of this policy is to:

- Eliminate unlawful discrimination
- Ensure that we treat all individuals fairly, with dignity and respect
- Promote equality of opportunity
- Promote equality of access
- Provide a safe, supportive and welcoming environment - for staff, contractors, volunteers, service users and visitors.
- Integrate our values into our work

This policy applies to every employee, prospective employee, volunteer, service user (our students) or person connected with Oxford International.

This policy forms part of the formal contract of employment for employees and Oxford International. All members of the organisation must abide by this policy - albeit that those in senior or managerial positions or with specific responsibilities for recruitment, selection, training, appraisal and promotion should be especially mindful of the policy. Any failure to comply could result in disciplinary proceedings.

3. Responsibilities

The Chief Executive Officer and senior management team has lead responsibility for promoting and ensuring compliance with this policy.

Directors and all employees with managerial or supervisory responsibility, have responsibility for implementing, monitoring and promoting this policy within the workplace.

The Group HR Director oversees, with support from external HR consultants, Oxford International's equality policies and ensures policies are updated and in line with current legislation.

All employees have a responsibility to work to the policy in all areas of their work, individually and collectively. Employees must make sure they do not:

- Discriminate against anyone
- Persuade or pressure another employee to discriminate
- Harass, bully or abuse other employees or the public for any reason
- Condone harassment

If anyone witnesses a discriminatory incident at work, they have a duty of care to others to challenge such behaviour and practice.

If an employee does not follow these and other requirements of this policy, it will be dealt with under the Disciplinary Procedure.

4. Equality and diversity at work

All organisation policies and benefits are designed to promote equal opportunity and protection for all employees, contractors and volunteers. In order to ensure that equality underpins all aspects of our employment policies, procedures and practices, we will, as far as is reasonably practicable:

- a) not unfairly discriminate against any job applicant or employee and, when recruiting, only consider factors which are relevant to someone's ability to perform the job well
- b) aim to create a workforce that is as diverse as the community we serve
- c) treat all employees and job applicants fairly in relation to all our employment policies and procedures and meet any reasonable and appropriate additional needs they may have
- d) value and respect the identities and cultures of our employees, volunteers, contractors and service users
- e) work towards a workplace that is free from discrimination, bullying and harassment and will act promptly on any complaints of discrimination, bullying, harassment or victimisation
- f) provide a safe working environment
- g) make the workplace, and information about work, as accessible as we can for all our employees
- h) give our employees clear information about job selection and training and encourage all employees to reach their full potential
- i) make sure that we work according to the relevant employment legislation and statutory codes of practice
- j) continue to develop good practice employment policies and procedures over and above those required by legislation
- k) apply this Equality and Diversity Policy through the organisation's recruitment and selection process, training programmes, grievance procedures and all other employment policies
- l) give employees and job applicants access to complaint procedures if they feel unfairly treated

5. Commitment to Service Users

Service users and potential service users can expect Oxford International to aim to:

- Design and deliver appropriate, accessible and effective services to all members of the community
- Work in partnership with others to promote equality and diversity
- Make sure that we provide services that comply with relevant legislation and statutory codes of practice
- Continue to develop good practice policies and procedures over and above that required by legislation
- Act promptly if we receive any complaints about the way we provide services
- Ensure complaints of anti-discriminatory practice are taken seriously and dealt with in line with the organisation's complaints policy.

6. Employment Practices

All employees have a personal responsibility to adhere to the principles of equal opportunity and maintaining harmony. Oxford International will actively promote equal opportunities in all our operations to ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential skills and abilities. Employees will be recruited and selected, promoted and trained on the basis of objective criteria. Sexual, racial and other forms of

discrimination and/or harassment will not be tolerated and Oxford International will treat unfair discriminatory conduct by any employee as a disciplinary offence.

7. Recruitment

Recruitment is carried out on the sole basis of the applicant's abilities and suitability for the job. Gender, race, colour, religion, sexual orientation, nationality, ethnic or national origin will not justify the non-recruitment of an applicant.

No applicant will be considered unsuitable for appointment, or less suitable than another applicant, on grounds of gender, race, colour, religion, sexual orientation and age.

Any job vacancies that are advertised internally or externally (for example via agencies or in the written press) will carry an equal opportunities statement.

Oxford International will not discriminate against anyone who has a spent conviction under the Rehabilitation of Offenders Act 1974. Having a criminal record will not necessarily bar an applicant from working or using services provided by Oxford International. This will depend on the nature of employment and the circumstances and background of an applicant's offence(s).

8. Harassment at work

Harassment is unsolicited and unwelcome workplace behaviour that adversely affects the dignity of the recipient. Where such behaviour is motivated by gender, sexual orientation, marital status, race, colour, national or ethnic origin, nationality, age or disability it also amounts to infringement of equality and diversity policy.

Oxford International is committed to ensuring that no harassment or victimisation at work, whatever the motivation, is overlooked or condoned. Such behaviour can range from extreme forms such as violence or bullying to less obvious actions like practical jokes and ridiculing colleagues or subordinates.

Conduct becomes harassment if it persists after the recipient has made clear that it is regarded as offensive, although a single offensive act can amount to harassment if it is so serious as to be obviously offensive towards the recipient.

Any form of harassment is a potential disciplinary matter and will be dealt with under Oxford International's disciplinary process and procedures.

9. Pay

Men and women are entitled to be paid equally without any bias on the grounds of sex.

All reasonable steps will be taken to ensure that male and female employees receive equal pay for the same work and for work rated as equivalent and for work of equal value.

10. Age Discrimination

The Equality Act 2010 includes provisions that ban age discrimination against adults in the provision of services and public functions. The ban came into force on 1 October 2012 and it is now unlawful to discriminate on the basis of age unless:

- the practice is covered by an exception from the ban
- good reason can be shown for the differential treatment ('objective justification')

Discrimination or harassment on grounds of age by employers is prohibited in the areas of recruitment, promotion and training. There can be direct and indirect age discrimination.

It is unlawful for an employer to discriminate against a person in the arrangements made for the purpose of determining to whom employment should be offered; in the terms on which that person is offered employment; and by refusing to offer, or deliberately not offering, employment.

Similarly, it is unlawful for an employer to discriminate against that person in the terms of employment; in the opportunities for promotion, a transfer, training, or receiving any other benefit; by refusing or deliberately not affording that person any such opportunity; or by dismissing or subjecting that person to any other detriment.

There are certain circumstances when some of the Regulations may not apply in relation to genuine occupational requirements of employment.

11. Disability Discrimination

11.1 Introduction

The law prevents discrimination against disabled people at work. Oxford International has set out our policy on disability for the guidance of all employees, subcontractors and clients and to ensure that we comply with our legal responsibilities to disabled people.

Any employee who believes that he or she has been unfairly discriminated against because of a disability or for reasons related to their having a disability can use the grievance procedure.

Disciplinary action will be taken against any employee who is found to have committed an act of discrimination against someone who has a disability. This includes treating them less favourably because of their disability or for a reason related to it; harassment or victimisation or failing to make reasonable adjustments to prevent a disabled person being placed at a substantial disadvantage at work.

Serious breaches of policy will be taken as gross misconduct.

11.2 Recruitment

Recruitment is carried out on the sole basis of the applicant's abilities and suitability for the job. A disability will not of itself justify the non-recruitment of an applicant. Reasonable adjustments to the application procedures will be made as required to ensure that applicants are not disadvantaged because of disability.

No applicant will be considered unsuitable for appointment, or less suitable than another applicant, unless full consideration has been given as to whether a reasonable adjustment can be made to overcome any effect of his or her disability upon his or her suitability.

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11.3 Induction

When a disabled employee commences employment Oxford International will, in consultation with the disabled employee, ensure that such reasonable adjustments are made as required to enable him, or her, to work safely and effectively and to secure equal access to the benefits of employment.

Where Oxford International does not have the relevant expertise to resolve the problem we will, where required, consult an outside specialist.

11.4 Training and Career Development

Oxford International recognises that all employees have equal rights to training, promotion, and other aspects of career development based purely on their abilities. Promotion and training will be made accessible to disabled employees by such adjustments as are reasonable.

11.5 Benefits

Disabled employees have equal access to all benefits and facilities and reasonable adjustments will be made where necessary.

11.6 Harassment

Harassment of disabled employees, clients or suppliers will be a disciplinary offence and may constitute gross misconduct. Any unwanted conduct that violates a disabled person's dignity or creates an intimidating hostile, degrading, humiliating or offensive environment for him or her is illegal.

11.7 Retention

As part of our commitment to equal opportunities for disabled people Oxford International will ensure that all reasonable measures are taken to retain disabled employees in employment.

Oxford International will make such adjustments as are reasonable to enable a disabled employee to carry out his or her duties. This will include, but is not limited to, consideration of the provision of specialist equipment, job re-design, re-training, flexible hours, remote working and/or re-deployment.

11.8 Adjustment

The prime responsibility for arranging the appropriate adjustment will lie with the line manager who will at all times consult with the employee concerned, whose agreement will be sought. The expertise of the disabled person concerning his or her own disability will be recognised. Where required an outside specialist may be consulted. Once an adjustment has been made it may need to be reviewed at agreed intervals to assess its continuing effectiveness.

11.9 Action Plan - Removal of Barriers

An action plan will be drawn up in consultation with the employee indicating which actions will be taken over a certain period of time to remove barriers to disabled people from the working environment and who has responsibility for various aspects of the plan and how it will be monitored.

The plan will address physical access to the premises, access to benefits of employment, terms and conditions of employment, recruitment and arrangements for recruitment, performance assessment, promotion and retention.

12. Racial Discrimination

Racial harassment is a particular form of harassment. It is conduct at work directed towards an employee by another employee or group of employees which is of a racial nature, or which is based on a person's race, colour or origins, and which is regarded as unwelcome or offensive to the recipient.

The following are examples that illustrate the sort of conduct that may be treated as racial harassment:

- Jokes about race.
- Offensive names used.
- References to people by offensive racist descriptions.
- Verbal or physical abuse because of a person's race or colour.
- Detrimental behaviour because of a person's race.
- Denial of opportunity because of race.

This policy applies to verbal and physical actions as well as any other form of communication including electronic communication such as text messages, emails, and faxes as well as written communications.

If any employee, service user, tenant, volunteer or supplier believes they are the subject of harassment they should make a formal complaint. Depending on the seriousness of the allegation, the alleged harasser may be suspended on full pay while the matter is being investigated under our disciplinary procedures.

The aim throughout is to resolve the complaint of harassment sensitively, impartially, effectively and quickly.

Complaints may, where appropriate, be made under the Oxford International Grievance Procedure or through the Complaints Procedure.

13. Training and Development

Oxford International is committed to a process of Continuous Professional Development (CPD) for all employees and will train, develop and promote on the basis of merit and ability only, and will encourage employees and applicants from regardless of gender, sex, sexual orientation, race, religion and disability.

14. Complaints Procedure

Oxford International does not want to foster a complaints culture but everyone needs to have the confidence to tell someone in authority if they feel that they have been unfairly treated and have the confidence that they will be listened to and their complaints dealt with properly. In particular complaints are to be dealt with quickly, at the lowest appropriate level and sensitively. All complaints are to be recorded and the details reported accurately in accordance with extant policy, and the outcome of any procedure must remedy the situation.

Any service user who wishes to raise complaint can do so under Oxford International's Complaint policy and to make sure that complaints are routinely recorded and each is fully investigated. All staff should expect to be treated with dignity and respect whilst at work, and have an equal responsibility

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to treat their colleagues similarly. Any employee who feels they have not been treated in accordance with this policy is entitled to raise the matter through the Company Grievance Procedure or the Whistleblowing Policy. All complaints will be dealt with seriously, promptly and confidentially. If a member of staff is found to have breached the Equality and Diversity Policy they may be subject to disciplinary action under the Company Disciplinary Procedure, which could result in dismissal.

15. Monitoring and Implementation

There will be a will review of this policy, at least annually, to ensure it is appropriate and responsive to relevant legislation- current lead responsibility for reviewing this policy sits with the Group HR Director, along with the CEO and senior management team. Amendments to the policy will be made, where appropriate, in the light of experience or changes in guidance and/or legislation.

We will ensure effective implementation of this policy by:

- Actively promoting it
- Circulating it to all workers, job applicants, contractors and volunteers, as well as placing it on the organisation's internal shared drive and the internet
- Consulting regularly and providing appropriate training and guidance, particularly to line managers, to make sure that they understand this policy and their legal responsibilities
- Taking appropriate action to deal with any breach of this policy
- Monitoring statistics to identify inequality and/or under-representation.

Statistical information will be recorded and collated in order to generate data (amongst others) that will enable Oxford International to examine whether certain groups may be disadvantaged by any aspects of its policies or practices. The results of monitoring will be shared Oxford International's management team.