

CREATIVE WORKS

A SPACE FOR WORK AND LIFE

EQUAL OPPORTUNITIES & DIVERSITY POLICY

1. Policy Statement

The Company is committed to achieving a working environment which provides equality of opportunity and freedom from discrimination on the grounds of race, colour, nationality, ethnic origin, gender, marital status, disability, religious beliefs, age, appearance or sexual orientation. This Policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.

The Company also aims to provide a service that does not discriminate against its clients and customers in the means by which they can access the services and goods supplied by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

2. Objectives of this Policy

- 2.1 To prevent, reduce and stop all forms of unlawful discrimination.
- 2.2 To ensure that recruitment, promotion, training, development, assessment, redundancy and service provision are determined on the basis of capability, qualifications, experience, skills and productivity.

3. Designated Officer

- 3.1 A designated officer will be appointed at each relevant BCE location. Nominated Leads
Big Creative Training
Alexis Michaelides (Managing Director)
Ben Jolly (Operations Director)

4. Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, colour, nationality, ethnic origin, gender, marital status, disability, religion, age, sexual orientation. Discrimination may be direct or indirect.

5. Types of Discrimination

5.1 Direct Discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of colour, nationality, ethnic origin, gender, marital status, disability, religion, age, or sexual orientation.

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5.2 Indirect Discrimination

This is the application of a policy, criterion or practice to a person which the employer would apply to others but which is such that:

- It is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents;
- The employer cannot justify the need for the application of the policy on a neutral basis; and
- The person to whom the employer is applying suffers detriment from the application of the policy.

Example: A requirement that all employees must be 6ft tall would indirectly discriminate against employees with an oriental ethnic origin, as they are less likely to be able to fulfil this requirement if that requirement is not justified by the position.

6. Unlawful Reasons for Discrimination

- 6.1** Age: It is not permissible to treat a person less favourably because of their age. This applies to people of all ages. This does not currently apply to the calculation of redundancy payments.
- 6.2** Disability: It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to the service and ability to be employed, trained, or promoted as a non-disabled person.
- 6.3** Gender reassignment: It is not permissible to treat a person less favourably because they identify as a different gender to that of their birth.
- 6.4** Marriage and Civil Partnerships: It is not permissible to treat a person less favourably because they are married or in a civil partnership. This applies to both men and women.
- 6.5** Pregnancy and maternity: It is not permissible to treat a person less favourably because they are pregnant or require maternity leave. For example, asking a woman during an interview if she is planning to have any (more) children constitutes discrimination.
- 6.6** Race: It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.
- 6.7** Religion or Belief: It is not permissible to treat a person less favourably because of their religious beliefs or their religion.
- 6.8** Sex: It is not permissible to treat a person less favourably because of their gender.
- 6.9** Sexual Orientation: It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because s/he is homosexual.

7. Reasonable Adjustments

The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

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- 7.1 Making adjustments to premises;
- 7.2 Re-allocating some or all of a disabled employee's duties;
- 7.3 Transferring a disabled employee to a role better suited to their disability;
- 7.4 Relocating a disabled employee to a more suitable office;
- 7.5 Giving a disabled employee time off work for medical treatment or rehabilitation;
- 7.6 Providing training or mentoring for a disabled employee;
- 7.7 Supplying or modifying equipment, instruction and training manuals for disabled employees; or
- 7.8 Any other adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company.

If an employee has a disability and feels that any such adjustments could be made by the Company, they should contact the Designated Officer.

8. Responsibility for the Implementation of this Policy

The co-operation of all employees is essential for the success of this Policy. However, the ultimate responsibility for achieving the objectives of this Policy, and for ensuring compliance with relevant Legislation and Codes of Practice, lies with the Company. Senior employees are expected to follow this Policy and ensure that all employees, subcontractors and agents do the same.

All employees, subcontractors and agents of the Company are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination on the grounds of race, colour, nationality, ethnic origin, gender, marital status, disability, religion, age or sexual orientation.

Employees may be held independently and individually liable for their discriminatory acts by an Employment Tribunal and ordered to pay compensation to the person who has suffered as a result of discriminatory acts.

9. Dedicated Grievance Procedure

9.1 If an employee feels that they have suffered direct or indirect discrimination they are encouraged to make every effort to resolve the issue informally before commencing the formal procedures in accordance with the Grievance Policy and Procedure.

10. Employees engaging in Discriminatory Conduct

- 10.1 Behaviour or actions found to be contrary to this Policy and the general spirit of the laws on which it is based will be considered to be serious disciplinary matters. In the most severe of cases, the employee responsible may face dismissal. Any such employees will have the right to appeal against such a summary dismissal by

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following the Company Disciplinary Procedure.

- 10.2 Discrimination leads to an unpleasant and non-productive work environment. No employee has the right to discriminate against another. If an employee is executing Company policy that may be indirectly discriminatory, the Company will not normally hold the employee responsible for any negative effects of that policy. Employees should inform the Designated Officer if they become aware of any discriminatory effects that a policy may have.
- 10.3 If a grievance is received by the Company that cites the actions of an employee has being discriminatory against another member of staff, the Company will send the accused employee a copy of the written complaint and arrange a mutually agreed date for that employee to attend an interview. The Company reserves the right to transfer the accused employee to a different department or location during the investigation process. In the alternative, the Company may suspend the employee on full, partial or no pay during that period.
- 10.4 If the employee is unable to attend the interview they must inform the Company as soon as possible. The Company will re-schedule the interview. If the employee fails to attend the interview and does not have a good reason, this fact will be noted on that employee's record and they may be subject to appropriate disciplinary action.
- 10.5 At the interview the accused employee will be given the opportunity to present their case. The employee may bring another person to the interview. Any evidence or information should be submitted to the Designated Officer in advance of the interview.
- 10.6 Following the interview the matter will be investigated and a decision will be made after considering all relevant evidence and submissions. The employee will be informed of the Company's decision in writing. The employee may be required to attend a training course, move to a different department or to another location within the Company either on a temporary or permanent basis. The employee may receive a caution, final warning or may be dismissed with or without notice depending on the Company's findings.
- 10.7 The employee shall have the right to appeal against the Company's decision. If the employee wishes to appeal they should inform the Company of their intention to do so and the grounds on which their appeal is based in writing within 14 days of the date on the initial decision letter.

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- 10.8 If the employee gathers information or evidence that was not available at the time of the first meeting at any point prior to the arrival of the Company's initial decision letter, any such evidence should be submitted to the Designated Officer.
- 10.9 If the employee appeals they will be invited to another interview to discuss the initial decision. Where possible, the Company will seek to provide a new interview panel to consider the facts of the appeal. The employee may bring another person to the appeal interview.
- 10.10 At the meeting the Company and the employee will discuss the original decision. If further investigation is required as a result of new evidence or information, this will be carried out in due course. A written appeal decision will be sent to the employee within 28 days of the disciplinary appeal meeting. If the investigation continues beyond 28 days the Company will write to the employee informing them that the disciplinary appeal is still being considered and will provide an estimated date of completion for the investigation. Upon completion of the investigation into the facts of the disciplinary appeal the employee shall be informed of the decision in writing. This decision is final and the employee shall have no further rights of appeal.

11. The extent of the Policy

- 11.1 The Company seeks to apply this Policy in the recruitment, selection, training, appraisal, development and promotion of all employees. The Company seeks to ensure that all sub-contractors and agents act in accordance with this Policy. The Company accepts no liability for the actions of sub-contractors and agents. The Company offers goods and services in a fashion that complies with the spirit of this Policy.
- 11.2 This Policy does not form a part of any employment contract with any employee and its contents are not to be regarded by any person as implied, collateral or express terms to any contract made with the Company.
- 11.3 The Company reserves the right to amend and update this Policy at any time.

Last updated	Next review	Person responsible
July 2025	July 2027	AM