

EQUAL OPPORTUNITIES & DIVERSITY POLICY

1. Policy Statement

MVP Workshops 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 MVP Workshops and to encourage full contribution from its diverse community. MVP Workshops is committed to actively opposing all forms of discrimination. MVP Workshops 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 MVP Workshops. MVP Workshops 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 MVP Workshops location.

Nominated leads:

Justin Bayley (Creative Director)

Joanna Vasanth (Director of Partnerships and Recruitment)

Stephen Barnabis (Managing Director, Project Zero)

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.

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 it 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 Gender and Marital Status

It is not permissible to treat a person less favourably on the grounds of their gender or the fact they are married. This applies to both men and women. Sexual harassment of men and women can be found to constitute sex discrimination. For example, asking a woman during an interview if she is planning to have any (more) children constitutes discrimination on the ground of gender.

6.2 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.

6.3 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.

6.4 Race, Colour, Nationality and Ethnic Origin

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.

6.5 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, or transsexual.

6.6 Religion or Belief

It is not permissible to treat a person less favourably because of their religious beliefs or their religion.

6.7 Gender Reassignment

It is not permissible to treat a person less favourably because they identify as a different gender to that of their birth.

7. Reasonable Adjustments

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

- 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 MVP Workshops, 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 MVP Workshops. 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 MVP Workshops 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

Informal Procedure

- 9.1 If an employee feels that they have suffered direct or indirect discrimination they are encouraged to attempt to raise and solve the issue informally before commencing the formal procedures detailed below.
- 9.2 Informal steps that may be taken include talking to your manager about the issue, or talking directly to any individual who you feel is responsible for the discrimination. This can be done verbally or by letter, and can be with the accompaniment of a colleague or trade union representative.
- 9.3 If you feel unable to deal with the issue informally, or if informal steps have failed to solve the problem, you should raise the matter according to the formal procedure detailed below.

Formal Procedure

- 9.4 Formal grievances should be detailed in writing, signed and dated, and submitted to the Designated Officer. The Grievance should contain the actions or policy that the employee believes is discriminatory and all relevant facts surrounding the action or policy, including any relevant dates, names and witnesses. The employee should indicate what they feel MVP Workshops should do and any other suggestions or information that they believe will assist in resolving the issue. Employees should keep copies of all correspondence for their own records.

Written Statement

- 9.5 Where the Grievance concerns the Designated Officer it should be

submitted instead to the employee's Line Manager or such other person of equal or greater seniority.

- 9.6 If the employee has a union or employee representative they may opt to consult with them about the action or policy, or request assistance with setting out their grievance in writing.

Initial Meeting

- 9.7 The employee will then be invited to a meeting to discuss the grievance (the "Initial Meeting") at a date and time mutually agreed upon, usually no longer than five working days after submission of the Grievance in writing.
- 9.8 The purpose of the Initial Meeting is to discuss the employee's Grievance, to explore possibilities to solve the problem at an early stage and to begin the process of investigating the Grievance.

Investigation

- 9.9 Following the Initial Meeting, MVP Workshops will investigate the matter. The investigation of a discrimination related Grievance will usually include (but is not limited to) the following actions:
- 9.9.1 where relevant, interviewing the person complained against and any witnesses to the incident;
- 9.9.2 reviewing relevant company policies; and
- 9.9.3 checking for any history of similar grievances.
- 9.10 MVP Workshops reserves the right to consult, involve and/or engage independent experts at any point in the investigation if of the opinion that to do so would result in a fairer and more satisfactory investigation process. Any independent expert will be subject to the same obligations of confidentiality as the Company.

Decision and Written Response

- 9.11 Following the completion of the investigation, and usually within five working days of the Initial Meeting, MVP Workshops will invite the employee to a second meeting in order to discuss the outcome of the investigation and any action that MVP Workshops proposes to take (the "Decision Meeting"). If the investigation continues beyond five working days MVP Workshops will write to the employee informing

them that the grievance is still being investigated and will provide an estimated time of completion for the investigation.

- 9.12 Following the Decision Meeting MVP Workshops will issue a written response to the employee's Grievance within five working days detailing the outcome of the investigation and any action that is to be taken. MVP Workshops shall also inform the employee in writing of their right to appeal if the decision goes against them.

Appeal

- 9.13 If the employee is dissatisfied with the decision they have the right to raise an appeal by submitting a written request to the Designated Officer, which should include any particular reasons for the employee's dissatisfaction with the decision. The appeal request must be submitted within five working days of the employee receiving the written response from MVP Workshops.
- 9.14 If the employee obtains information or evidence that was not available at any point prior to receiving MVP Workshops' written response this information or evidence should be submitted to the Designated Officer at the earliest possible stage in the appeal process.
- 9.15 MVP Workshops will invite the appellant employee to another meeting to discuss their Grievance and appeal (the "Appeal Meeting"), to be held usually within five working days at a time and place which shall be notified to the employee in advance. The Appeal Meeting and procedure will, where possible, be chaired by a senior manager who was not involved in the initial Grievance Procedure.
- 9.16 At the Appeal Meeting MVP Workshops and the employee will discuss the investigation and the decision and the particular grounds for the employee's dissatisfaction. If further investigation is required as a result of new evidence or information, MVP Workshops shall be allowed five working days to conduct the further investigation. The Appeal Meeting shall be considered closed upon completion of the further investigation and a notice to that effect shall be sent to the employee.
- 9.17 The employee shall have a statutory right to be accompanied at the Appeal Meeting.
- 9.18 Within five working days of the close of the Appeal Meeting MVP

Workshops shall issue a final written response to the Grievance. The decision resulting from the Appeal Meeting is final and the employee shall have no further rights of appeal.

Records, Accompanying Persons and Confidentiality

- 9.19 MVP Workshops shall be responsible for taking notes of the proceedings of each meeting during the Grievance Procedure. Where possible the notes of each meeting should be signed by all parties. Copies of meeting notes will be provided to the employee.
- 9.20 Employees shall, having made a reasonable request, have the right at every stage of the Grievance Procedure to be accompanied to any meeting concerning the Grievance by a colleague, suitable certified trade union representative or an official employed by the trade union. Where the employee is accompanied at any point in the procedure, copies of meeting notes and written responses of the Company shall be copied to the accompanying person.
- 9.21 The companion shall be allowed to support the employee's case and confer with the employee during the meeting. The companion shall not answer questions on behalf of the employee, address the meeting without the employee's consent or prevent the Designated Officer from explaining his case.
- 9.22 All Grievances will be handled with as high a degree of confidentiality as is practicable, with special consideration for the often sensitive nature of Grievances falling under this Policy.
- 9.23 Confidential records of the Grievance will be kept in the employee's personnel file in accordance with Data Protection legislation.

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 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, MVP Workshops 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 MVP Workshops that cites the actions of an employee as being discriminatory against another member of staff, MVP Workshops will send the accused employee a copy of the written complaint and arrange a mutually agreed date for that employee to attend an interview. MVP Workshops reserves the right to transfer the accused employee to a different department or location during the investigation process. In the alternative, MVP Workshops 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 MVP Workshops as soon as possible. MVP Workshops 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 MVP Workshops' decision in writing. The employee may be required to attend a training course, move to a different department or to another location within MVP Workshops 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 MVP Workshops' findings.
- 10.7 The employee shall have the right to appeal against MVP Workshops' decision. If the employee wishes to appeal they should inform MVP Workshops 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.

- 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 MVP Workshops' 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, MVP Workshops 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 MVP Workshops 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 MVP Workshops 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 MVP Workshops seeks to apply this Policy in the recruitment, selection, training, appraisal, development and promotion of all employees. MVP Workshops seeks to ensure that all sub-contractors and agents act in accordance with this Policy. MVP Workshops accepts no liability for the actions of sub-contractors and agents. MVP Workshops 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 MVP Workshops reserves the right to amend and update this Policy at any time.

Last updated	Next review	Person responsible
November 2019	November 2021	JV