

# Equal Opportunity and Diversity Policy



This Policy was last reviewed in August 2024

## Statement of equal opportunity policy

### 1. Policy Statement

1.1 Hornbill is committed to providing a working environment which offers equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation. This Policy aims to remove unfair and discriminatory practices within Hornbill and to encourage full contribution from its diverse community. Hornbill is committed to actively opposing all forms of discrimination.

1.2 Hornbill 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 Hornbill. Hornbill believes that all employees and clients are entitled to be treated with respect and dignity.

1.3 Any and all personal data used in connection with this Policy shall be collected, held, and processed in accordance with [Privacy Policy – Employee Personal Data](#)

### 2. Objectives of this Policy

2.1 To prevent, reduce, and stop all forms of unlawful discrimination in line with the UK Equality Act 2010.

2.2 To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy, and dismissals are determined on the basis of capability, qualifications, experience, skills, and productivity.

### 3. Designated Officer

**Name:** Lindsey Gill  
**Position:** CFO  
**Email:** cfo@hornbill.com

#### **4. Definition of Discrimination**

4.1 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, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation. Discrimination may be direct or indirect, and includes discrimination by perception and association.

#### **5. Types of Discrimination**

##### **5.1 Direct Discrimination**

5.1.1 This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation.

##### **5.2 Indirect Discrimination**

5.2.1 This is the application of a policy, criterion, or practice which the employer applies to all employees 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, if not justified by the position, would indirectly discriminate against employees with an ethnic origin that on average are shorter than 6ft, as they are less likely to fulfil this requirement.

##### **5.3 Harassment**

5.3.1 This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

##### **5.4 Victimisation**

5.4.1 This occurs when a person is treated less favourably because they have brought or intend to bring proceedings or they have given or intend to give evidence.

#### **6. Unlawful Reasons for Discrimination**

##### **6.1 Sex**

6.1.1 It is not permissible to treat a person less favourably on the grounds of sex, marital status, civil partnership, pregnancy or maternity, gender reassignment, or transgender status. This applies to men, women, and those undergoing or intending to undergo gender reassignment. Sexual harassment of men and women can be found to constitute sex discrimination.

**Example:** Asking a woman during an interview if she is planning to have any (more) children constitutes discrimination on the grounds of gender.

##### **6.2 Age**

6.2.1 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**

6.3.1 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 any services and ability to be employed, trained, or promoted as a non-disabled person.

## **6.4 Race**

6.4.1 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**

6.5.1 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 they are homosexual, heterosexual, or bisexual.

## **6.6 Religion or Belief**

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

## **7. Reasonable Adjustments**

7.1 Hornbill has a duty to make reasonable adjustments to facilitate the employment of a disabled person.

These may include:

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

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

## **8. Responsibility for the Implementation of this Policy**

8.1 All employees, subcontractors, and agents of Hornbill are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination, harassment, or victimisation on the grounds of their race, sex, pregnancy or maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation.

8.2 The co-operation of all employees is essential for the success of this Policy. Senior employees are expected to follow this Policy and to try to ensure that all employees, subcontractors, and agents do the same.

8.3 Employees may be held independently and individually liable for their discriminatory acts by Hornbill, and in some circumstances, an Employment Tribunal may order them to pay compensation to the person who has suffered as a result of discriminatory acts.

8.4 Hornbill takes responsibility for achieving the objectives of this Policy, and endeavours to ensure compliance with relevant Legislation and Codes of Practice.

## **9. Acting on Discriminatory Behaviour**

9.1 If an employee is the subject, perpetrator, or witness to discriminatory behaviour, please advise the Designated Officer.

## **10. The Extent of the Policy**

10.1 Hornbill seeks to apply this Policy in the recruitment, selection, training, appraisal, development, and promotion of all employees. Hornbill offers goods and services in a fashion that complies with the spirit of this Policy.

10.2 This Policy does not form 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 Hornbill.

10.3 Hornbill reserves the right to amend and update this Policy at any time.

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