

SWH is committed to the policy of equal treatment of all individuals.

All employees of SWH have personal responsibility for ensuring that no individual in their place of work is judged or discriminated against on the grounds of gender, marital status, responsibility for dependants, sexual orientation, gender reorientation, religion, race, nationality, skin colour, ethnic origin, culture, political beliefs, disability, age or spent convictions.

In particular, all SWH employees are expected to abide by the requirements of the:

- Equal Opportunities Commission Codes of Practice
- Commission for Racial Equality Codes of Practice
- Race Relations Act 1976
- Sex Discrimination Act 1986
- Disability Discrimination Act 1995
- Equal Pay Act 1979

Purpose of the policy

As an employer of over 600 people, SWH is committed to eliminating discrimination from all of its employment practices. SWH's aim is to influence individual behaviour and to create a working environment that promotes equality of treatment and of opportunity.

The policy is both evidence of and clarification of SWH's commitment not to discriminate in its employment practices and procedures on the grounds of gender, marital status, responsibility for dependants, sexual orientation, gender reorientation, religion, race, nationality, skin colour, ethnic origin, culture, political beliefs, disability, age or spent convictions. Many of these areas are covered by legislation or codes of practice. Others may not be. However, it is intended that no employee, or potential employee, shall receive less favourable treatment because of any of the above aspects or be disadvantaged by any other condition or requirement which cannot be justified.

The policy defines SWH's understanding of discrimination, group and individual responsibilities for eliminating discrimination, equal opportunities in different areas of discrimination, and the actions necessary to eliminate discrimination.

Forms of discrimination

It is possible to discriminate against both existing and potential employees.

Direct discrimination occurs when a person is treated less favourably than another person on the grounds of gender, race, age etc. In many cases discrimination is made unlawful through legislation such as the Sex Discrimination, Race Relations and Disability Discrimination Act. In other cases, such as age discrimination or religious discrimination, it is not yet unlawful but clearly undesirable.

Indirect discrimination occurs when a condition or requirement, although applied equally to all groups, has the effect of excluding, penalising or treating any of those groups less favourably. For

example, a policy prohibiting women from wearing trousers at work could mean that Muslim women are excluded from employment.

Positive discrimination is illegal. For example it is illegal to employ someone purely on the basis of their race, gender etc.

Victimisation occurs when a person is singled out for less favourable treatment, for instance, when it is known that they are taking proceedings or acting as a witness against their employing organisation.

In recruitment discrimination can occur when the choice of candidates for interview or appointment is influenced solely by discriminatory factors.

In treatment of employees discrimination can occur:

- when deciding which employees have access to promotion, training, allowances or services
- between colleagues where harassment takes place
- by the discriminatory abuse of procedures eg the disciplinary procedures.

Circumstances when discrimination can take place legally

In certain occupations discrimination can be legal where there is a genuine qualification for the occupation for reasons of decency or privacy.

Courses and events can be run for specific groups if it can be shown that those groups are currently underrepresented at certain areas and levels of the workforce. This is known as Positive Action and can include positively seeking to attract applicants from underrepresented groups.

Responsibility for equal opportunities

Overall responsibility for this Policy rests with the Managing Director. Day-to-day responsibility is assigned to the Financial Controller and the relevant members of his Personnel Department.

The Financial Controller will report regularly to the Managing Director. A section on Equal Opportunities will be included in Personnel Reports presented to Management and Board Meetings.