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## **EQUAL OPPORTUNITIES & VALUING DIVERSITY POLICY**

### **PURPOSE**

1. BH is committed to the principle of equality of opportunity and preventing discrimination. BH will not discriminate on the grounds of: race, colour, ethnicity, marital status, sexual orientation, gender (including gender re-assignment), religion or philosophical belief, disability, age, caring responsibilities, spent convictions or any other factors not relevant to our work. BH will only discriminate in these areas where required to do so by statutory or regulatory requirements (such as Health & Safety or nationality and or length of residence in the UK in relation to security clearance).

### **AIM**

2. This policy is designed by BH to work towards the following objectives:

- Being an employer of choice that attracts a diverse range of candidates and values the diversity of its workforce.
- Supporting employees in fulfilling their potential to benefit individuals and business
- Aligning our practices with those required of our public and private sector clients to challenge social inequality, actively promote equality of opportunity and prevent discrimination and communicating these with our partners and suppliers.
- Preventing and removing discrimination from our activities

### **IMPLEMENTATION**

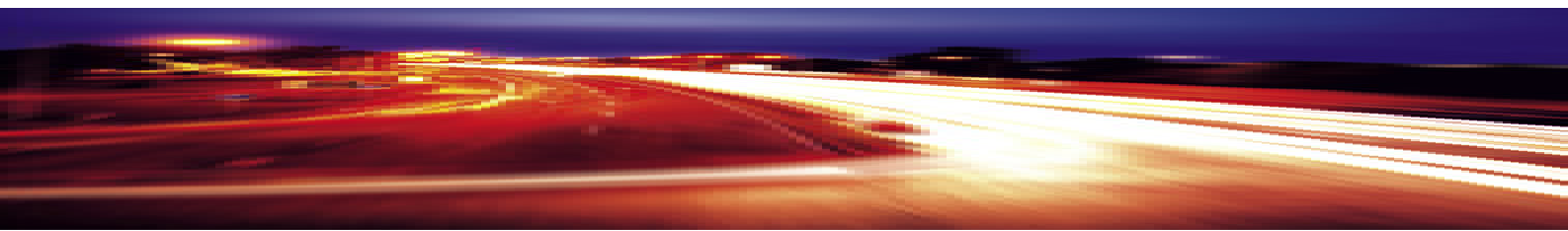
3. The BH Board is ultimately responsible for this policy. Its revision and preparation of the annual Equality Action Plan is led by the Chief Operating Officer.

4. BH recognises that equality is the responsibility of all employees and must be considered in dealing with customers and customer data not just employees and employee data.

5. All staff have a responsibility to behave in a manner consistent with valuing and respecting the diversity of their colleagues and clients. Staff are encouraged to increase their knowledge of customs and practices from diverse groups and other official sources e.g. the Diversity Works for London website and its Gold Standard Diversity Tool for SMEs provides further information and a suggested method for developing diversity practices. BH aims to use the toolkit in developing its diversity systems and practices.

6. Managers are responsible for ensuring they manage their team in a manner consistent with the purpose and aim of this policy and that they proactively address behaviours amongst their team which are inconsistent with these.

7. Breach of this policy or behaviour inconsistent with its purpose and aims may lead to disciplinary action by the Group Managing Director.





8. If staff or managers are concerned that this policy is not being fully implemented in their area or they have concerns around potential inequalities they have a responsibility to raise this with the Business Unit Managing Director or Group Managing Director as appropriate.

9. BH's Equality and Valuing Diversity Purpose statement is expected to be evident in and applied to:

- Our culture and working environment
- Recruitment and selection
- Terms and conditions of employment (including pay)
- Our suppliers
- Training and development
- Career progression
- Annual performance reviews
- Redeployment and redundancy

10. BH does not condone harassment, victimisation, direct or indirect discrimination.

12. Reasonable adjustments must be explored to accommodate employees or customers with disabilities.

### MONITORING

13. BH will monitor the effectiveness of this policy by

- reviewing the Equality Action Plan on an annual basis
- utilising the Diversity Works for London website and its Gold Standard Diversity Tool for SMEs on an annual basis

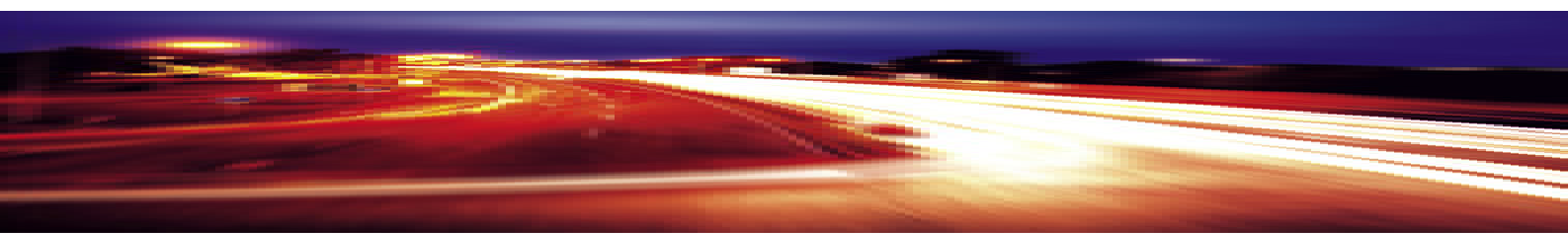
14. We will continuously develop our monitoring processes and aim for these to be carried out annually of the ethnic breakdown of applicants for posts and staff across the business units. This will be used in setting our plans for recruitment and service provision to our clients, interim contractors and candidates alike.

Name, title, date

Mark Botham, Chief Operating Officer, 9.1.2009

Signature

A handwritten signature in blue ink, appearing to read 'M Botham', written over a horizontal line.





## EQUALITY ACTION PLAN 2008/9

### Gold Standard Diversity Tool - Completed September 2008

The following table presents the outcome of an on-line self assessment utilising the Diversity Works for London Gold Standard Diversity Toolkit. It is planned that a regular annual assessment will be undertaken to measure comparative progress against previous achieved measures.

#### Results

	Your current score	Your last score	Your first score
Gaining buy-in	<i>Progressing</i>		
Recruitment, promotion & development	<i>On your way</i>		
Managing a diverse workforce	<i>Progressing</i>		
Promoting a productive & harmonious workplace	<i>Progressing</i>		
Running a diverse business	<i>On your way</i>		
Monitoring & review	<i>On your way</i>		

The following table outlines more detailed plan that BH has put in place, including responsibilities and timelines for completion. It also presents some points for consideration and or dependencies:



Action	Responsibility	Timescale	Comments
Implementation of revised Equal Opportunities & Valuing Diversity Policy	COO / Business Unit Directors	August 09	Using DWfL guidance and any relevant legal/regulatory requirements that arise during the time period.
Promotion of equal opportunities policy by placing it on the BH internet site	COO	End January 09	
<p>Communication to recruiting staff and where appropriate dedicated training on public sector responsibilities such as:</p> <p>1. Statutory Code of Practice on:</p> <ul style="list-style-type: none"> <li>• Racial Equality in Employment (Commission for Racial Equality 2005)</li> <li>• Employment and Occupation (Disability Rights Commission 2004)</li> <li>• Equal Pay &amp; Sex Discrimination 2003 and Gender Equality Duty 2007 (Equal Opportunities Commission)</li> </ul> <p>2. Other relevant Legislation and Acts of Parliament e.g. Race Relations Amendment Act 2000, DDA 1995, WTD 1993, Employment Equality Acts for Age (2006), Religion/Belief (2003), Sexual Orientation (2003) Regulation, Equality Bill 2006, EAA Regulations 2003 etc.</p>	COO	Ongoing – with first round of communication completion by end September 09	<p>New action to improve communications -process and budgets for training to be developed.</p> <p>Maintain subscriptions to legal on-line services e.g. <a href="http://www.lawspeed.com">www.lawspeed.com</a> so that appropriate staff receive regular updates on recruitment and employment legislation, regulations etc.</p>
Training/information provided to all line managers on new policy, & Diversity, Equality and Delivery plan for cascade to staff.	COO	End September 09	
Information cascade to relevant staff (including bid and proposal writing teams) in the Business Units on public sector responsibilities and their applications to us as contractors	COO/Public Sector Director	End October 09	Employees to be encouraged to participate and feedback
Review client specific contractual obligations impacting on BH operations and corporate responsibilities. Update BH policies accordingly and cascade to staff, partners and suppliers.	COO and Business Unit Directors	Annual process in August	

Action	Responsibility	Timescale	Comments
Information cascade to suppliers and partners of BH Equal Opportunities and Diversity policy, its obligations and requirements that its public and private sector clients demand.	COO, Business Unit Directors	End January 09 to current suppliers and partners; on-going process to capture new suppliers and partners.	Acknowledgement of receipt required by suppliers and partners. Confirmation that processes in place to adhere to requirements (e.g. TfL PSL Framework Agreement Schedule 11 items 4.3.2, 4.4.3, 4.5.2 and 4.7.3.
Recruitment monitoring by ethnicity showing stages of selection process and success of candidates against potential candidate pool, for both internal and external candidates and roles.	COO	July 09	Dependant on implementation of data monitoring and gathering systems
Audit of Equal Opportunities data held for all existing staff	COO	End January 2009	
Equal pay audit for gender and working hours	COO/FD	May 2009	Completed. Actions arising out of audit included in plan for 09/10
Recruitment and selection training. Ensuring all staff who participate in these processes are trained and offered refresher training as appropriate	COO	March 2010	New action to improve communications -process and budgets for training to be developed
Monitoring of staff who attended and applied for training by ethnicity etc	COO	f/y 2010/11	New data monitoring system needed

## BH Equal Opportunities & Valuing Diversity Policy – Monitoring Form

Candidate Reference \_\_\_\_\_

Completion of this section of information is voluntary but the information will help us ensure equality of opportunity in that it will allow us to implement and monitor the effectiveness of our equal opportunities policy, would you be willing to share the following information with us, the information which you give me will not affect your application in any way.

BH is committed to the principle of equality of opportunity and preventing discrimination. BH will not discriminate on the grounds of: race, colour, ethnicity, marital status, sexual orientation, gender (including gender re-assignment), religion or philosophical belief, disability, age, caring responsibilities, spent convictions or any other factors not relevant to our work. BH will only discriminate in these areas where required to do so by statutory or regulatory requirements (such as Health & Safety or nationality and or length of residence in the UK in relation to security clearance).

***The information on this form is for monitoring purposes only and will not be made available to those assessing your application, the information supplied is to be treated in the strictest confidence and will not affect a job application in any way.***

Age	
16-24	45-54
25-34	55-65
35-44	65+

Gender	
Male	Female

Do you have a disability	
Yes	No

Ethnic Origin	
<b>White</b>	<b>Black or Black British</b>
White British	Caribbean
White Irish	African
Any other white background	Any other Black background
<b>Mixed</b>	<b>Chinese or other ethnic group</b>
White and Black Caribbean	Chinese
White and Black African	Any other (please specify)
White and Asian	
Any other mixed background	
<b>Asian or Asian British</b>	
Indian	
Pakistani	
Bangladeshi	
Any other Asian background	

Sexual Orientation	
Bisexual	Prefer not to say
Gay/lesbian	
Heterosexual	

Religious belief/faith	
Buddhist	Sikh
Christian	None
Hindu	Other (please state)
Jewish	Prefer not to say
Muslim	

*This is the 13+1 equal opportunities monitoring, taken from the Race Relations Amendment Act.*