

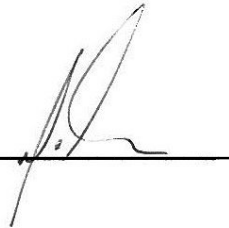
W J G EVANS & SONS

EQUAL OPPORTUNITIES POLICY

THIS POLICY IS REVIEWED ANNUALLY BY

MATTHEW EVANS/ANDREW MERRIMAN

SIGNED: _____

A handwritten signature in black ink, appearing to be 'M. Evans', is written over a horizontal line. The signature is stylized and cursive.

DATE: 04/06/2014

1. GOOD PRACTICE IN EQUAL OPPORTUNITIES IN W J G EVANS & SONS

1.1 Policy Statement of Intent

“W J G Evans & Sons confirms its commitment to a comprehensive policy of equal opportunities in employment in which individuals are selected, trained, appraised, promoted and otherwise treated on the basis of their relevant merits and abilities and are given equal opportunities within W J G Evans & Sons

In the provision of equal opportunities, W J G Evans & Sons recognises and accepts its responsibilities under the Equal Pay Act 1970 as amended 2003; Sex Discrimination Act 1975 as amended 2003; The Race Relations Act 1976 as amended 2000; Disability Discrimination Act 1995, as amended 2001, 2003; Prevention from Harassment Act 1997; Human Rights Act 1998; The Employment Act (Family Friendly Legislation) 2002; Part Time Workers (Prevention of Less Favourable Treatment) Regulations 2000; Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2000; Employment Equality (Sexual Orientation) Regulations 2003; Employment Equality (Religion or Belief) Regulations 2003. and the Employment Equality (Age) Regulations 2006.

No job applicant, employee will receive less favourable treatment on the grounds of race, colour, nationality, ethnic or national origins, gender, marital status, sexuality, disability, religion, political belief, socio-economic background, parental status, age or trades union membership. W J G Evans & Sons is committed to a programme of action to ensure that this policy be fully effective.”

- 1.2 The principle of equal opportunities is enshrined in the Charter and Statutes of W J G Evans & Sons.
- 1.3 Matthew Evans has determined that all applicants for employment and subsequently staff at work should be made aware of W J G Evans & Sons commitment to equal opportunities and the removal of unlawful discrimination and other forms of discrimination which is good practice to prevent.
- 1.4 The policy statement and all succeeding good practice will be equally applicable to all areas of W J G Evans & Sons
- 1.5 Equal opportunities shall apply to all aspects of W J G Evans & Sons’s business, environment and cultural activities and will apply to all persons irrespective of their contractual employment with W J G Evans & Sons.

- 1.6 Where employees have communication difficulties or have a limited knowledge of English, methods will be found to assist understanding of the equal opportunities policy.

2. LEGISLATION AND CODES OF PRACTICE

- 2.1 In formulating and implementing policies on equal opportunities W J G Evans & Sons has sought to comply not only with the letter but also with the spirit of the law. The codes of practice of the Commission for Racial Equality (CRE) and the Equal Opportunities Commission (ECO) give comprehensive guidelines on compliance with the legislation, as well as setting out detailed recommendations and examples on how to pursue equal opportunities. The codes do not have the status of law but they are approved by Parliament and can be taken into account when determining discrimination cases.
- 2.2 W J G Evans & Sons has also taken into account the responsibilities that the Disability Discrimination Act (1995) places on organisations and the guidance issued by the Government regarding the Disability Discrimination Act.

3. DIRECT AND INDIRECT DISCRIMINATION

- 3.1 The legislation covers for race (Race Relations Act 1976), gender (The Sex Discrimination Act 1975), marital status age (Employment Equality (Age) Regulations 2006) and disability (Disability Discrimination Act 1995) both direct and indirect discrimination. The following general definitions are based on those in the CRE and EOC's Codes.
- 3.2 Direct discrimination consists of treating a person on racial grounds (see Note) or on grounds of gender less favourably than others are or would be treated in the same or similar circumstances, and of treating a married person less favourably on the grounds of marital status, than an unmarried person of the same sex would be in the same or not materially different circumstances. For example direct discrimination occurs where a person is refused a job or promotion because of their ethnic origin or their gender or because they are married.
- 3.3 Indirect discrimination may occur when a condition or requirement is applied to a job, but members of one group (eg women as opposed to men, racial minorities as opposed to the majority, or less able bodied persons) find it more difficult to meet this requirement and are thus placed at a disadvantage. If this requirement or condition cannot be objectively justified (ie on grounds other than gender, marital status, race, age or disability), this may constitute indirect discrimination.

Examples of indirect discrimination given include:-

- 3.31 Requiring higher language standards than are needed for safe and effective performance of job.

3.32 Requiring a person to be available to travel extensively on behalf of W J G Evans & Sons, where such a task could be reasonably undertaken by someone else.

3.33 Requiring qualifications to have been obtained in the United Kingdom where there are no legal or professional reasons to justify this.

3.4 The legislation regarding disability defines discrimination as when a disabled person is treated less favourably than someone else and:

3.41 the treatment is given for a reason relating to the person's disability and that reason does not apply to the other person and,

3.42 this treatment cannot be justified.

3.5 W J G Evans & Sons has determined that for its own purpose it will include religion and sexual orientation as two categories for inclusion in the group (3.1) with the same rights within Company procedures with regard to equal opportunity.

3.6 In other non-statutory areas other than the two described in 3.4, ie: religion, political belief, socio-economic background, parental status, age and trade union membership, W J G Evans & Sons shall make every effort to prevent both direct and indirect discrimination through the application of fair procedures.

NB Racial grounds are the grounds of ethnic background, nationality – including citizenship – or ethnic origins and groups defined by reference to these groups are referred to as racial groups.

4. VICTIMISATION

4.1 It is unlawful to victimise individuals who have made allegations or complaints of race, age, gender or marital discrimination or discrimination because of disability or provided information about such discrimination. Persons who victimise individuals will be subject to the disciplinary procedure of W J G Evans & Sons.

5. POSITIVE ACTION

5.1 Section 47 of the Sex Discrimination Act 1975 allows an employer to give special encouragement to, and provide specific training for, female employees only, or male employees only, where at any time within the twelve months immediately preceding, there were no persons of the gender in question amongst those doing that work, or the number of persons of that gender doing the work was comparatively small.

- 5.2 Section 37 and 38 of the Race Relations Act 1976 allow an employer to give special encouragement to, and provide specific encouragement to, and provide specific training for, a particular racial group where an employer is satisfied that at any time within the immediate preceding twelve months:
- 5.21 there were no persons of the racial group in question amongst those doing that work at that establishment; or,
 - 5.22 that the proportion of persons of that group among those doing that work at that establishment was small in comparison with the proportion of persons of that group:
 - 5.22.1 among all those employed by that employer there; or
 - 5.22.2 among the population of the area from which that employer normally recruits persons for work in employment at that establishment.
- 5.3 Examples of positive measures given in the codes include:
- 5.31 Training employees (male or female) for work which is traditionally the preserve of the other gender.
 - 5.32 Giving positive encouragement through for example special courses, for women or men or people from ethnic minority groups to equip themselves for posts in areas where they are under-represented.
 - 5.33 Placing advertisements which encourage applications from the minority gender or racial group, but which make it clear that selection will be made without reference to gender or race.
- 5.4 Positive action should not be confused with positive discrimination (or reverse discrimination) which is unlawful. Once applications have been received, applicants should be treated equally and selection should be based purely on the criteria already defined for the post.
- 5.5 W J G Evans & Sons intends, where appropriate, to take advantage of those sections of the Sex Discriminations Act, and the Race Relations Act which allow for positive action.

6. RESPONSIBILITY FOR IMPLEMENTATION OF THE POLICY

- 6.1 W J G Evans & Sons has determined that the Equal Opportunities Policy should be coupled with a positive commitment by its senior management and staff to ensure its full implementation.
- 6.2 W J G Evans & Sons has determined that Matthew Evans shall have overall responsibility for ensuring formulation, implementation and monitoring of W J G

Evans & Sons's Equal Opportunities Policy in consultation with ACAS and the Equal Opportunities Commission.

- 6.3 W J G Evans & Sons will identify from the above sources, suitably qualified and trained officer/s with a proportion of working time devoted to matters of equal opportunity. The officer/s should amongst other things, have responsibility for advising W J G Evans & Sons's senior management, and other appropriate staff and committees of W J G Evans & Sons, in matters of equal opportunities and should produce an annual report in consultation with the body/ies mentioned in paragraph 6.2.

Equal Opportunities – Staff

7. Recruitment Material for Staff Appointments

- 7.1 W J G Evans & Sons when advertising posts must state in its recruitment material that it is an equal opportunities employer. Advertisements must avoid using any terms, which suggest discrimination for reasons of gender, race, age or disability.

Job descriptions and person specifications

- 7.2 All job/post descriptions must clearly and accurately identify the duties of the job and the person specification should outline the essential requirements to perform it such that the job fulfils the needs intended and the educational qualifications, skills, work experience and personal attributes required are necessary for satisfactory performance of the job. W J G Evans & Sons undertakes to review regularly job descriptions to ensure that they remain valid.
- 7.3 W J G Evans & Sons should ensure careful specification of the post taking care not to include unnecessary requirements. Particular care must be taken to avoid indirect discrimination in person specifications ie setting a requirement which although applying to all persons is such that a considerably smaller proportion of persons of a particular group can meet the requirement and it cannot be shown to be essential for the performance of the job. For example the imposition of age limits which are not justified, have been found to constitute unlawful indirect discrimination against individuals who have taken time out of employment for family responsibilities.

Publicising Posts

- 7.4 All posts advertised for will use open recruitment procedures (i.e. Job Centre). Posts, which are for fixed term appointments, shall normally be advertised internally and externally. It is W J G Evans & Sons's policy to seek as wide a field of applicants as possible and as a consequence it may seek assistance from a variety of reputable recruitment services.
- 7.5 The wording of advertisements shall not discourage any applicant who is eligible for a post from applying.

- 7.6 Where appropriate the “positive action” clauses of the legislation shall be considered. See section 5 above.
- 7.7 Careful consideration shall be given to the most appropriate means of advertising posts and steps will be taken to ensure that notices of job vacancies are advertised in a range of media which are likely to reach potential applicants from all areas of the community. Examples include Job Centre Plus, ethnic minority press, community centres, free press, local radio, local transport and recruitment agencies specialising in ethnic minority staff and under represented sectors.
- 7.8 Application procedures and forms for all posts shall be regularly reviewed so as to ensure that only information essential for the job (as determined by the job description and person specification) is sought. It is acknowledged that methods of application other than the use of application forms (eg. the interviewer could record the information) may be appropriate where for example an application form would require a higher standard of English or comprehension than is necessary for satisfactory performance of the job or where a person is unable to fill in such a form because of a disability.

8. Arrangements for Staff Appointments

- 8.1 W J G Evans & Sons has issued guidance to members of staff likely to be appointed to selection panels in good selection practice.

Training in Equal Opportunities

- 8.2 W J G Evans & Sons is committed to ensuring that as far as is reasonably practical personnel staff and other employees who come into contact with job applicants are trained in the provisions of the Legislation and Codes, including the provision that it is unlawful to instruct or put pressure on others to discriminate. Staff responsible for short-listing, interviewing and selecting candidates shall also be clearly informed of selection criteria and of the need for their consistent application. They shall be given training in recognition of stereotypical views and the effects which generalised assumptions and prejudices about race, colour, nationality, ethnic or national origins, sex, marital status, parental status, socio-economic background, age, disability, religion or political belief might have on selection decisions. Staff shall be made aware of Company policy as it effects equal opportunities. Existing training and staff development programmes shall include equal opportunities issues. Training material and courses offered by the ACAS will be used to support in-house training programmes and will be seen to be a priority.

Shortlisting

- 8.3 Shortlisting shall involve more than one person. Records of ratios of applicants and shortlists for gender, race, age and disability shall be kept. All applicants should be given similar consideration during the shortlisting process.
- 8.4 Applicants should be asked in advance of interview whether they have any special requirements in order that the recruitment process may be adjusted where necessary so that applicants with a disability are not disadvantaged.

Interview panels

- 8.5 It is a requirement of W J G Evans & Sons that at least one member of the interview panel has attended a training programme on equal opportunity awareness.
- 8.6 Interviewing shall be conducted by more than one person and include at least one person of each gender in the panel. Careful consideration has been given to the membership of interview panels for posts to take account of principles of equal opportunities. In certain instances it may be appropriate to call in outside experts to assist in the interview procedures for posts with at least one member of the panel having professional knowledge of equal opportunities issues.
- 8.7 Members of selection panels need to ensure fair treatment by asking comparable questions of all candidates and by asking questions which relate only to the requirements of the job (see guidance provided). Interviewers must take care to avoid questions which may be construed as discriminatory, eg. questions about religious or political views, marriage plans, marital status, family intentions, children, or domestic responsibilities.

If there is a disabled candidate the members of the selection panel should consider whether, after any appropriate reasonable adjustment, that individual would be the best person for the post.

Selection

- 8.8 Selection tests shall be monitored and checked to ensure that they measure only what is relevant to the ability to do, or to train for, the job for which they are intended. Care should be taken to ensure that they do not discriminate indirectly through, for example, assumptions about candidates background or interests.

Recording

- 8.9 Where appointments are made that do not match the job description, the selection committee should provide reasons for their choice.
- 8.10 The chairs of selection panels are advised to keep a brief record of each stage of the appointment process giving the reasons for the rejection of unsuccessful candidates. Such reports should be retained for a period of at least six months in case a complaint of discrimination is made and to aid monitoring for equal opportunities.

9. Terms and Conditions of Employment

- 9.1 W J G Evans & Sons in amending current terms and conditions of employment, will endeavour to ensure that the wording is in accordance with W J G Evans & Sons's equal opportunities policy statement. The terms and conditions of employment will contain a statement of the policy, emphasise each employee's obligation to it and inform employees that breaches of the legislation or of the policy may lead to disciplinary action.

10. Harassment Procedures

- 10.1 W J G Evans & Sons is committed to a working and learning environment free from unlawful discrimination.
- 10.2 W J G Evans & Sons has formal harassment procedures which can be invoked by any employee who alleges that he or she has been the subject of discrimination, harassment or victimisation by any of its employees.
- 10.3 The harassment procedures will be made known to all existing and new members of staff.
- 10.4 W J G Evans & Sons recognises that it has a duty to ensure that its harassment procedures are understood by all employees.
- 10.5 As personal harassment can seriously affect working and social conditions for staff, any incidents of harassment will be considered as extremely serious and may be grounds for disciplinary action which could lead to dismissal or expulsion.

11. Work Environment

- 11.1 W J G Evans & Sons is committed to maintaining and developing an environment which encourages all members of staff to contribute fully on an equal basis to the life of W J G Evans & Sons. The environment shall be supportive of the dignity and self esteem of individuals and free from harassment.

12. Working Arrangements

- 12.1 Wherever practicable, W J G Evans & Sons will give sympathetic consideration to members of staff whose personal circumstances change or to job applicants with special needs and will endeavour to accommodate these through agreement on retraining, reemployment, and/or alternative working arrangements and extended leave arrangements. Specific guidance is given on working arrangements for people from ethnic minorities (section B) and people with disabilities (section D).
- 12.2 W J G Evans & Sons acknowledges that flexible working arrangements should be encouraged with schemes for those with domestic responsibilities, particularly parenthood and care of the elderly, in an attempt to retain their valuable skills and expertise, and to help them to plan their careers.
- 12.3 It is recognised that such arrangements help to enlarge the potential labour "pool", reduce time and expenditure on recruitment induction and training of new employees and improves efficiency. Recognised examples of such arrangements and schemes are:
 - a) enhanced maternity/paternity leave;
 - b) leave without pay to care for dependants;

- c) career break schemes (including means of keeping in touch and re-entry training);
- d) working part time, term time or flexi time;
- e) working at home;
- f) job sharing schemes.

Childcare

- 12.4 W J G Evans & Sons acknowledges that the provision of childcare facilities for staff is of the highest priority.

13. Career Development

Probationary Procedures

- 13.1 W J G Evans & Sons has probationary procedures in operation for the different categories of staff – including induction, training and warning systems.
- 13.2 To avoid the risk of unlawful discrimination W J G Evans & Sons intends to give all staff of the same category the same length of probationary service unless the variation is for clearly defined and justifiable reasons.

Promotion and Regrading

- 13.3 W J G Evans & Sons shall from time to time examine all criteria and procedures for promotion, career development, regrading and discretionary payments to ensure that they comply with W J G Evans & Sons's equal opportunities policy and are operated fairly. In considering the selection and promotion of academics due weight shall be given to relevant achievements other than publications, such as teaching skills and the ability to communicate effectively for those people who have taken time out of the labour market for family reasons.
- 13.4 W J G Evans & Sons requires staff wherever appropriate to participate in regular appraisal interviews as part of career development procedures which help to identify staff with potential (including those who might move from one category of work to another eg. secretarial to administrative) and may assist in identifying areas of imbalance in the provision of training and promotion opportunities.

Training

- 13.5 In assessing the training needs of staff, W J G Evans & Sons has regard to the needs of groups such as women or members of ethnic minorities, and to the special needs of individuals with learning difficulties, disabilities, and those returning to work after a career break. Section 5 above refers to the positive action clauses of the legislation.

- 13.6 Training courses and associated publicity material are examined by the responsible staff to ensure that they meet with legal requirements and with W J G Evans & Sons's equal opportunities policy.
- 13.7 Details of training opportunities and activities are widely circulated and displayed to help ensure that all employees are aware of them.
- 13.8 As far as possible training arrangements take into account the needs of employees with domestic responsibilities.

14. Company Procedures

- 14.1 W J G Evans & Sons seeks to use non-discriminatory language in all its internal and external documents, official correspondence, publications, and other communications.
- 14.2 The membership and chairing of Company committees and other official bodies is kept under constant review to ensure that minority groups and women have appropriate representation.

15. Monitoring and Reviewing

- 15.1 W J G Evans & Sons Limited acknowledges that the monitoring and review of equal opportunities policies is essential in order that it may:-
- * assess the employment situation with regard to particular groups;
 - * identify areas where change or improvements to policies or procedures may be needed;
 - * identify the need for training;
 - * measure progress;
 - * ensure course provision will not discriminate against particular groups;
 - * ensure that the assessment and recruitment procedures do not disadvantage particular groups.

Monitoring

- 15.2 W J G Evans & Sons will retain a statistical record as comprehensive as possible of the representation of women, men, marital status, racial or ethnic origin and people with disabilities amongst applicants for posts, candidates interviewed, new appointments and current staff. This will enable a comprehensive picture of the patterns of employment amongst various groups to be built up and will be

made widely available. Monitoring the reasons why people leave W J G Evans & Sons is under consideration.

- 15.3 Wherever possible a nationally accepted method of monitoring will be used that will assist in comparing My with other institutions. Where this is not possible a locally devised method shall be discussed with trade union and or other representatives.
- 15.4 W J G Evans & Sons has decided that information for the statistical record shall be gained through voluntary self assessment by potential and existing staff completing an equal opportunities monitoring form (unless the required information is clearly available). Staff can be assured that information collected will form a confidential record, which will be used only for statistical analysis of equal opportunities policies.

Review

- 15.5 W J G Evans & Sons intends to make an annual report in the monitoring of its equal opportunities practices to the senior management team. The report will include information on:
- * the outcome on the relevant year's monitoring;
 - * specific measures adopted to promote equal opportunities;
 - * assessment of progress against identified priorities and timetables;
 - * where necessary, recommendations on where improvements could be made.

SECTION B: EMPLOYMENT OF PEOPLE FROM ETHNIC MINORITIES

1. W J G Evans & Sons will assess the situation with regard to employment of people from ethnic minorities and where necessary take appropriate action aimed at bringing about change.
2. W J G Evans & Sons will seek to establish whether there is any evidence that individuals from any particular racial group:
 - a) do not apply for employment, promotion or training; or,
 - b) are not recruited or promoted at all, or are appointed in a significantly lower proportion than their rate of application; or,

- c) are concentrated in particular types of contract (part/full time, short term etc.), grades, sections or departments; or,
 - d) leave jobs at a higher rate than individuals of other racial groups.
3. In the light of this data W J G Evans & Sons will examine why particular trends exist and whether these can be justified. Reasons for the trends might include:
- a) confining advertisements unjustifiably to those areas or publications which may exclude or disproportionately reduce the numbers of applicants of a particular racial group;
 - b) not making clear that a fully comparable qualification obtained overseas is as acceptable as a UK qualification;
 - c) use of selection tests which contain irrelevant questions or exercises on matters which may be unfamiliar to racial minority applicants (for example, general knowledge questions on matters more likely to be familiar to indigenous applicants);
 - d) stereotyping and assumptions about educational backgrounds and career histories;
 - e) lack of role models;
 - f) individual and/or institutional attitudes;
 - g) lack of awareness of possible misunderstandings that occur in interviews between persons of different cultural backgrounds;
 - h) inadequate knowledge of the type of work available in W J G Evans & Sons.
4. Where W J G Evans & Sons has identified areas of imbalance and possible reasons for these which cannot be justified positive measures aimed at bringing about change shall be considered. They may include any of the following:
- a) a programme of action including appropriate targets with a timetable against which the effectiveness of policies can be judged;
 - b) "positive action" as permitted by the provisions of the Race Relations act 1976;
 - c) the advertising of posts in the ethnic minority press as well as other newspapers;
 - d) the use of employment agencies and careers offices in areas where ethnic minority groups are concentrated as well as the agencies and offices normally used;
 - e) providing flexible working arrangements;

- f) raising awareness of equal opportunities issues, particularly amongst those charged with selection and promotion;
- g) encouraging undergraduates and postgraduates from ethnic minorities to consider a Company career;
- h) recognising overseas degrees, diplomas and qualifications that are not necessarily of an inferior quality to UK qualifications;
- i) providing opportunities through open days, continuing education programmes etc to make ethnic minority groups more informed and aware of W J G Evans & Sons as an employer.

Working Arrangements

5. W J G Evans & Sons acknowledges that they should consider flexible working arrangements so as to accommodate the special needs of people from ethnic minorities in an attempt to retain their valuable skills and expertise. Such arrangements may also help to reduce time and expenditure on recruitment, induction and training of new employees. The arrangements may include the following:
 - a) Flexible approaches to requests from individuals for extended leave of absence (either unpaid or by allowing leave entitlement to be “saved up”), to visit their country of origin overseas.
 - b) Making efforts, where reasonably practicable, to meet the cultural and religious needs of staff. This may include religious observance and holidays and diet requirements.

SECTION C: EMPLOYMENT OF WOMEN

1. W J G Evans & Sons reviews and monitors the proportion of women in employment at certain levels of W J G Evans & Sons structure for both full time and part time posts. W J G Evans & Sons is committed to reducing any imbalances that may be identified.
2. W J G Evans & Sons will seek to identify whether women:
 - a) do not apply for employment, promotion or training;
 - b) are not recruited or promoted at all, or are appointed in significantly lower proportion than their rate of application.
 - c) are concentrated in particular types of contract (eg. full/part time, short term etc), grades, sections or departments.

3. This may be achieved by using the information obtained from monitoring (see section A paragraph 15) which will assist W J G Evans & Sons in:
 - a) comparing the proportion of women in specific grades against those in similar grades employed outside W J G Evans & Sons system; and,
 - b) comparing the proportion of promotions and regradings amongst men from one grade to another with that of women in similar grades; and,
 - c) comparing the proportion of women on various payment grades (inline with the equal pay act of 1970)
 - d) identifying rates of application and shortlisting for women.

4. In the light of this data, W J G Evans & Sons may then need to examine why particular trends exist and whether these can be justified. Reasons for such trends might include any of the following:
 - a) discriminatory selection or promotion procedures;
 - b) time taken out of work for family responsibilities;
 - c) inflexible working arrangements;
 - d) lack of confidence and encouragement;
 - e) absence of role models;
 - f) institutional/individual attitudes;
 - g) attitudes towards part time working.

5. Where areas of imbalance are identified and possible reasons for these cannot be justified positive measures aimed at bringing about change may be considered.

These measures may include any of the following:

- a) a programme of action including setting appropriate targets (as opposed to quotas which are illegal except for the registered disabled) with a timetable against which the effectiveness of policies can be judged;
- b) “positive action” as permitted by the provisions of the legislation;
- c) providing flexible working arrangement;
- d) providing childcare facilities;

- e) raising awareness of equal opportunities issues, particularly amongst those charged with selection appraisal and promotion;
- f) encouraging women undergraduates and graduate students to consider a Company career.

SECTION D: PEOPLE WITH DISABILITIES

1. W J G Evans & Sons will assess the situation with regard to the employment of people with disabilities and where necessary take appropriate action aimed at bringing about change.

2. **The Disability Discrimination Act and Definition of Disability**

The Disability Discrimination Act 1995 gives disabled people new rights in the areas of employment and in access to goods, services and property. It also ensures recognition of the needs of disabled people wishing to study.

Disability is defined under the Disability Discrimination Act as:

“A physical or mental impairment which has a substantial and long term adverse effect on a person’s ability to carry out normal day-to-day activities.”

3. **Disability Statement**

W J G Evans & Sons will provide information about its facility and services for people with disabilities in order to give an accurate outline of the level of provision and accessibility. The statement will contain information about access for disabled visitors, specialist equipment, plus W J G Evans & Sons policy towards disabled staff, admission arrangements and complaints and appeals procedures.

4. **Recruitment**

- 4.1 W J G Evans & Sons welcomes prospective staff with disabilities.
- 4.2 W J G Evans & Sons in its recruitment material and its prospectus will include a statement indicating that it welcomes applications from prospective staff with disabilities.
- 4.3 W J G Evans & Sons takes steps to ensure that those involved in the selection process or at preliminary visits are able to offer informed advice on facilities for the disabled.
- 4.4 W J G Evans & Sons accepts responsibility for ensuring that expert advice in the necessary assistance and provision of special amenities and aids is readily available to those involved in the selection process and during the subsequent employment or study period.
- 4.5 W J G Evans & Sons will ensure that all staff involved in the recruitment process have received training on the implications of the Disability Discrimination Act.

5. **Unlawful Discrimination in Employment**

- 5.1 It is unlawful for an employer to treat a disabled person less favourably than someone else because of their disability, unless there is a good reason, which must be substantial and material to the individual case.
- 5.2 W J G Evans & Sons has a duty to examine what changes or reasonable adjustments it could make to the workplace or method of work which would overcome the effects of the disability. It is W J G Evans & Sons's duty to make any changes which are reasonable. Such changes could include:
- alterations to buildings
 - providing a reader or interpreter
 - providing supervision
 - providing flexible working hours
 - allocating some of the disabled person's duties to another person
 - assigning the person to a different workplace
 - modifying equipment
 - changing the format of instruction or manual
 - allowing the person to be absent during working hours for rehabilitation, assessment or treatment.
- 5.3 The Act does not require organisation to make unreasonable adjustments. Factors to be considered include the value of adjustment to the disabled person, disadvantages caused to other employees and the cost involved.

6. **Retention of Disabled Employees**

If a member of staff becomes disabled or has a disability which worsens, W J G Evans & Sons is required to deal with this in a non-discriminatory way and comply with the duty of reasonable adjustment. This may include:

- modifying a job to accommodate the employee's changed needs
- providing training to help the person take on a new job
- moving the person to a different post within the organisation
- offering a part time post.

7. **Support**

- 7.1 W J G Evans & Sons undertakes to appoint a co-ordinator/s for staff with disabilities.

The co-ordinator/s for staff with disabilities will have the following functions:-

- personal contact with staff with disabilities;
- liaison with external agencies;
- monitoring of Company policy and practice in regard to staff with disabilities;
- support and advise to Trade Unions in the provision for staff with disabilities.

7.2 When a disabled person becomes a member of W J G Evans & Sons, W J G Evans & Sons will recognise its duty to make reasonable changes to premises or employment arrangements if these substantially disadvantage a disabled employee compared to a non-disabled person.

7.3 **Facilities**

A booklet outlining the facilities for staff and visitors with disabilities and sources of support will be made available.

An accessibility map including braille maps drawn up with the help of persons with disabilities, indicating access points, toilets for the disabled, parking spaces and also areas where problems of access exist will be available.

7.4 To ensure awareness of the range of support which might be provided for staff with disabilities, W J G Evans & Sons seeks to establish dialogue with groups representing the disabled in the community and at national level (eg. RNIB, SKILL, Employer's Forum on Disability).

8. **Assessment and Appraisal**

8.1 W J G Evans & Sons undertakes to vary the methods and procedures of assessment if a person is unable to be assessed by methods normally approved by W J G Evans & Sons because of a disability. These arrangements are designed to compensate for the restrictions imposed by the disability without impairing the validity for assessment.

W J G Evans & Sons will review the arrangements for promotion and career development on a regular basis to ensure that the criteria required are justified.

9. **Teaching**

W J G Evans & Sons acknowledges its responsibility to improve the awareness of all staff to the needs of people with disabilities.

(The Staff Development Unit will provide short courses to assist staff in understanding the needs of clients with disabilities).

10. **Accommodation**

10.1 W J G Evans & Sons will ensure that new buildings will be of appropriate design, with necessary fittings and equipment provided.

10.2 W J G Evans & Sons as far as practicable will bring existing buildings into conformity with the provisions of the Chronically Sick and Disabled Persons Act 1970.

10.3 W J G Evans & Sons undertakes as far as is practicable to provide toilets and other necessary facilities for disabled persons.