

THRINGS

SOLICITORS

Equality & Diversity Policy

Document Owner	HR Director
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EQUALITY AND DIVERSITY POLICY

1.1 Purpose

This policy sets out the commitment of the firm towards equality and diversity, including ensuring equal opportunities, and the prevention of discrimination, harassment or victimisation. This policy applies to all employees and Partners and consultants as well as to any contract workers and suppliers.

1.2 Review of Policy

This policy is reviewed annually. Equality and Diversity training is a mandatory requirement for all staff and Partners across the firm, all new starters will receive this training as part of their induction and all individuals across the firm are expected to attend this training every two years to refresh their awareness of equality principles. Equality and diversity training is also a mandatory element of all management and talent development training programmes.

In order to ensure the effectiveness of this policy and the firm's training of equality and diversity, regular analysis of equality data will be completed by the HR team which may also include awareness surveys, and reviews of the selection criteria used for any systems where decisions are made relating to individuals access to opportunities (such as promotion or training) will happen annually.

The firm does not tolerate acts which breach this policy and all instances of such behaviour or alleged behaviour will be taken seriously, fully investigated and may be subject to disciplinary proceedings. If evidence of discrimination, harassment or victimisation is found, this could result in dismissal.

1.3 Responsibility for Policy

The Head of HR is responsible for this policy, monitoring its effectiveness and implementing any development requirements. The Management Board are responsible for approving any Equality and Diversity development recommendations made in conjunction with this policy.

2. IMPORTANCE OF EQUALITY AND DIVERSITY

2.1 Firm's Culture and Values

First and foremost, equality and diversity is important to the firm because we value everyone as an individual and we recognise that if we encourage respect amongst individuals this will promote good working practices and team achievements in line with our values and culture. We are committed to fair access to opportunities because this contributes to the firm being a successful and positive environment. We believe that working together and respecting each other is the best way to accomplish this. Ensuring equality and diversity principles are followed across the firm is therefore not just about meeting the legal standards set, but is about truly valuing each other as individuals and growing our firm by appreciating each others differences.

2.2 Legal Requirements

(a) The Equality Act 2010 defines the expectations of everyone in an employment environment in relation to equality and diversity. These expectations relate to specified protected characteristics as follows:

- Age;
- Disability;
- Gender Reassignment;
- Marriage and civil partnership;
- Race (includes colour, nationality and ethnic of national origins);
- Religion or belief (including no religion or belief);
- Sex;
- Sexual orientation;
- Pregnancy and maternity (although not defined as a “Protected Characteristic” under the Act, it is a characteristic that has protection defined in many elements of the Equality Act and therefore has significant relevance in this list).

It is unlawful for the firm, including any employees or partners of the firm, to treat anyone in a work place context less favourably because of one of the above characteristics. This is potentially discriminatory treatment. Discrimination can occur both directly and indirectly. Specific areas are outlined under the Equality Act as being of particular focus in this regard, such as:

- Recruitment and selection (including the treatment of people who are not employed by the firm, and people who have left the firm);
- Use of medical information;
- Access to promotion;
- Terms and conditions of employment;
- Pay;
- Pregnancy and maternity arrangements;
- The way services are provided to our clients;
- How the firm’s employees and partners treat third party suppliers and contract workers;
- Support provisions for people with disabilities;
- How complaints relating to equality and diversity principles are dealt with.

(b) The SRA Code of Conduct (Principle 9) requires all law firms to run the business (and Solicitors to carry out their role) in a way that encourages equality of opportunity and respect for diversity.

Under outcome focused regulations, the firm must ensure:

- No one connected to the firm discriminates unlawfully, or victimises or harasses anyone in the course of professional dealings;
- Services are provided to clients in a way that respects diversity;
- Reasonable adjustments are made to ensure disabled clients, employees or managers are not placed at a substantial disadvantage compared to those who are not disabled;
- The approach taken towards recruitment and selection encourages equal opportunity and respect for diversity;
- Complaints of discrimination are dealt with promptly, fairly, openly and effectively.

3. EQUAL OPPORTUNITIES STATEMENT

The firm is committed to fair and equitable access to all opportunities across the firm. In order to support this, clear processes have been developed in a number of relevant areas of the business to enable fair treatment.

Some of the most common procedures linked to equality and diversity principles are as follows:

- Recruitment and selection, including Associate and Partnership applications;
- Access to training and development;
- Flexible working;
- How we measure performance;
- Access to outsourcing and external suppliers including instruction of experts;
- Our Client Service standards;
- How complaints are dealt with.

The full procedures for these activities are set out in the firm's policies published on the Intranet Office Manual.

4. BULLYING, HARASSMENT AND VICTIMISATION

The firm is committed to the prevention of discrimination, harassment or victimisation towards employees, partners and third parties or contract workers. Bullying, harassment and victimisation taken many different forms. For the purpose of this policy the below definitions are available as a guide:

4.1 Bullying

Bullying consists of three main types, verbal, physical and emotional. It may include the use of coercive or threatening behaviour (such as intimidation) to affect others, particularly when the behaviour occurs routinely or involves an imbalance of power. Bullying would usually be directed

repeatedly towards a particular individual or group of individuals perhaps on the grounds of a protected characteristic (detailed above).

4.2 Harassment

Harassment usually involves an action or inaction, behaviour, exclusion, comment or physical contact which the recipient finds objectionable or offensive related to a protected characteristic (detailed above). It may result in the recipient feeling threatened, humiliated, intimidated, patronised or demoralised or cause a hostile or offensive environment.

4.3 Victimization

Victimization is where someone is treated less favourably as a result of them making, or being involved in, a complaint made connected to discrimination or harassment.

If anyone feels bullied, harassed or victimised they are encouraged to report this as a complaint in accordance with the firm's Grievance procedure. The firm believes that any form of bullying, harassment or victimisation is a serious misconduct offence and if found could result in summary dismissal. Equally, an allegation of harassment or victimisation must not be made lightly; any allegation of the above made out of malice and without foundation could also be regarded as a gross misconduct offence subject to disciplinary proceedings.

5. COMPLAINTS PROCEDURE

If any employee or Partner feels that unfair treatment has occurred in accordance with this policy, the firm's Grievance procedure should be followed.

6. Barristers and Third Parties

6.1 Barristers

Barristers should be instructed on the basis of their skills, experience and ability. The firm will not base any decision to instruct a barrister on one of the protected characteristics defined in section 2.2.

Clients' requests for a named barrister should be complied with, subject to the firm's duty to discuss with the client the suitability of the barrister and to advise appropriately.

The firm will discuss with the client any request by the client that only a barrister who is not disabled or who is of a particular gender, marital status, race, racial group, colour, ethnic or national origin, nationality, religion or belief, or sexual orientation be instructed. In the absence of a valid reason for this request, which must be within the exemptions permitted by the anti discrimination legislation, the firm will endeavour to persuade the client to modify their instructions in so far as they are given on discriminatory grounds. Should the client refuse to modify such instructions the firm will cease to act.

6.2 Suppliers

All lists of approved suppliers and databases of contractors, agents and other third parties who, or which, are regarded as suitable to be instructed by those within the firm have been compiled only

on the basis of the ability of those persons or organisation to undertake work of a particular type and contain no discriminatory exclusion, restriction or preference.

6.3 Clients

The firm is generally free to decide whether to accept instructions from any particular client but any refusal to act will not be based upon any of the forbidden grounds.

The firm will take steps to meet the different needs of particular clients arising from its obligations under the anti discrimination legislation (such as the Disability Discrimination Act) and the Solicitors Anti Discrimination Rule 2004.

In addition, where necessary and where it is permitted by the relevant anti discrimination legislation (for example, provisions relating to positive action or exemptions), the firm will seek to provide services which meet the specific needs and requests arising from clients' ethnic or cultural background, gender, responsibilities as carers, disability, religion or belief, sexual orientation or other relevant factors.

7 Promoting Equality and Diversity

This firm is committed to promoting equality and diversity in the firm as well as in those areas in which it has influence.

Employees and partners will be informed of this anti discrimination policy and will be provided with equality and diversity training appropriate to their needs and responsibilities.

All those who act on the firm's behalf will be informed of this anti discrimination policy and will be expected to pay due regard to it when conducting business on the firm's behalf. In all its dealings, including those with suppliers, contractors and recruitment agencies, the firm will seek to promote the principles of equality and diversity.

The firm will make every effort to reflect its commitment to equality and diversity in its marketing and communication activities.

8 Implementing the Policy

8.1 Responsibility

Ultimate responsibility for implementing the policy rests with the partners of the firm. The firm will appoint a senior person within it to be responsible for the operation of the policy.

All employees, and partners of the firm, are expected to pay due regard to the provisions of its anti discrimination policy and are responsible for ensuring compliance with it when undertaking their jobs or representing the firm.

Acts of discrimination or harassment on any of the forbidden grounds by employees or partners of the firm will result in disciplinary action. Failure to comply with this policy will be treated in a similar fashion. The policy applies to all that are employed in the firm and to all partners.

Acts of discrimination or harassment on any of the forbidden grounds by those acting on behalf of the firm will leave to appropriate action including termination of services where appropriate.

9 Complaints of discrimination

The firm will treat seriously, and will take action where appropriate, all complaints of discrimination or harassment by any of the forbidden grounds made by employees, partners, clients, barristers or other third parties.

All complaints will be investigated in accordance with the firm's grievance or complaints procedure and the complainant will be informed of the outcome.

10 Monitoring and Review

The policy will be monitored and reviewed in a manner proportionate to the size and nature of the firm on a regular basis (and in any event at least annually) to measure its progress and judge its effectiveness. In particular, the firm will, as appropriate, monitor and record:

- a The gender and ethnic composition of the workforce and partners, as well as the number of disabled staff, partners, members, directors, at different levels of the organisation.
- b The ethnicity, gender and disability of all applicants, short listed applicants and successful applicants for jobs and training contracts.
- c The ethnicity, gender and disability of all applicants for promotion (including to partnership, to the role of a member of a limited liability partnership or director of a recognised body) and training opportunities and details of whether they were successful.
- d Where it is possible to do so, and where doing so will not cause offence or discomfort to those whom it is intended to protect, the sexual orientation and religion or belief of all partners and staff will be monitored to ensure that they are not being discriminated against in terms of the opportunities of benefits available to them. The firm should, however, be aware that partners and staff may choose not to disclose their sexual orientation or religion or belief. Care should be taken to avoid inadvertent discrimination in such cases.
- e The number and outcome of complaints of discrimination made by staff, partners, barristers, clients and other third parties.
- f The disciplinary action (if any) taken against employees by race, gender and disability.

This information will be used to review the progress and impact of the anti discrimination policy. Any changes required will be made and implemented.