
Equal Opportunities Policy

Statement of Policy and Purpose

1. **VG&P** (the Employer) is committed to equal opportunities for all staff and applicants.
2. It is our policy that all employment decisions are based on merit and the legitimate business needs of the organisation. The Employer does not discriminate on the basis of race, colour or nationality, ethnic or national origins, sex, gender identity or expression, gender reassignment, sexual orientation, marital or civil partner status, pregnancy or maternity, disability, religion or belief, age, or any other ground on which it is or becomes unlawful to discriminate under the laws of England and Wales (referred to as **Protected Characteristics**).
3. Our intention is to enable all our staff to work in an environment that allows them to fulfil their potential without fear of discrimination, harassment, or victimisation. The Employer's commitment to equal opportunities extends to all aspects of the working relationship including:
 - Recruitment, shortlisting, and selection procedures;
 - Terms of employment, including pay, conditions, and benefits;
 - Training, appraisals, career development, and promotion;
 - Work practices, conduct issues, allocation of tasks, discipline, and grievances;
 - Remote, hybrid, and digital work environments, including internal and external digital communications (e.g., email, messaging channels, social media);
 - Work-related social events, conferences, and off-site meetings; and
 - Termination of employment and matters after termination, including references.
4. This policy is intended to help the Employer achieve its diversity, equity, and anti-discrimination aims by clarifying the responsibilities and duties of all staff in respect of equal opportunities and discrimination.
5. The principles of non-discrimination and equal opportunities also apply to the way in which staff treat visitors, clients, customers, suppliers, contractors, and former staff members.

6. This is a statement of policy only and does not form part of any contract of employment. This policy may be amended at any time by the Employer, in its absolute discretion.

Who is Responsible for Equal Opportunities?

7. Achieving an equal opportunities workplace is a collective task shared between the Employer and all its staff. This policy and the rules contained in it apply to all staff of the Employer irrespective of seniority, tenure, working hours, or location, including all employees, directors and officers, consultants and contractors, casual or agency staff, trainees, homeworkers, hybrid workers, fixed-term staff, and any volunteers or interns (referred to as **Staff**).
8. The board of directors of the Employer has overall responsibility for this policy and for equal opportunities and discrimination law compliance in the workplace. The **Studio Manager** has been appointed as the person with day-to-day operational responsibility for these matters.
9. All Staff have a personal responsibility to ensure compliance with this policy, to treat colleagues and third parties with dignity at all times, and not to discriminate against or harass other members of Staff, visitors, clients, customers, suppliers, or former staff members. In addition, Staff who take part in management, recruitment, selection, promotion, training, and other aspects of career development (referred to as **Managers**) have a special responsibility for leading by example and ensuring compliance.
10. Managers must take all necessary proactive steps to:
 - Promote the objective of equal opportunities and the values set out in this policy;
 - Ensure that their own behaviour and that of the Staff they manage complies in full with this policy;
 - Ensure that any complaints or observations of discrimination, victimisation, or harassment (including against themselves or from third parties) are dealt with swiftly and appropriately, and are never suppressed or disregarded.

What is Discrimination?

11. Discrimination occurs in different ways, some more obvious than others. Discrimination on the grounds of any of the Protected Characteristics is prohibited by law, even if unintentional, unless a specific statutory exception applies.

Direct Discrimination

12. **Direct Discrimination** occurs when a person is treated less favourably than another because of a Protected Characteristic. Examples include refusing a person a job or promotion because of their age, sex, race, or sexual orientation.
13. Direct discrimination can also arise when a person does not possess the Protected Characteristic themselves but:
- Is **perceived** to possess it (for example, if a person is treated less favourably because they are wrongly believed to hold a particular religious belief); or
 - Is **associated** with someone who possesses it (for example, being passed over for promotion because they care for a disabled family member or partner).

Indirect Discrimination

14. **Indirect Discrimination** arises when an employer applies an apparently neutral provision, criterion, or practice (PCP) that puts individuals sharing a Protected Characteristic at a particular disadvantage compared to others, unless that PCP can be objectively justified as a proportionate means of achieving a legitimate aim.
15. Indirect discrimination protection also extends to individuals who experience a disadvantage due to their **association** with someone who possesses a Protected Characteristic (for example, requiring rigid full-time office hours that disproportionately disadvantage a worker who has primary caring responsibilities for a disabled dependant).

Victimisation

16. **Victimisation** means subjecting a person to a detriment because they have made a complaint of discrimination, provided evidence or information in connection with a complaint, or done any other act under or in connection with equality legislation, or because it is suspected that they might do so.

Prevention of Harassment and Sexual Harassment

Definition of Harassment

17. Harassment is:

- Unwanted conduct related to a Protected Characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them; or
- Unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them (**Sexual Harassment**); or
- Less favourable treatment of a person because they have rejected or submitted to Sexual Harassment or harassment related to sex or gender reassignment.

18. Harassment can occur in physical environments, remote working setups, and digital platforms (e.g., work emails, messaging apps, video calls, or social media). Examples include:

- Insults, slurs, derogatory jokes, stereotyping remarks, or offensive banter based on a Protected Characteristic or of a sexual nature;
- Physical or verbal abuse, threatening behaviour, or unwelcome physical contact (e.g., touching, hugging, kissing, or invading personal space);
- Unwelcome requests for sexual favours, sexual advances, suggestive comments, or repeated requests for dates or social contact after it has been made clear such requests are unwelcome;
- Displaying, transmitting, or sharing offensive or sexually explicit images, materials, or messages via digital messaging channels or email;
- Deliberate misgendering, mocking, mimicking, or belittling a person's appearance, accent, identity, or disability;
- Shunning or excluding someone from conversations, digital channels, or work activities;
- "Outing" or threatening to "out" someone's sexual orientation or gender identity; and
- Implicit or explicit suggestions that employment status, tasks, or progression are tied to tolerating harassment or sexual advances.

19. Key Principles Regarding Harassment:

- A single incident can amount to harassment;
- It is not necessary for an individual to intend to harass someone for their behaviour to constitute harassment;

- The individual affected does not need to communicate that the behaviour is unwelcome before it constitutes harassment;
- The onus is on every member of Staff to ensure their conduct is appropriate and respectful. In cases of doubt, you must refrain from the conduct.

Proactive Preventative Duty

20. In accordance with statutory requirements under the **Worker Protection Act**, VG&P is committed to taking proactive, reasonable steps to prevent sexual harassment and all other forms of harassment in the workplace before they occur. To achieve this, the Employer will:

- Conduct regular risk assessments to identify potential harassment risks across all working environments (including remote settings, client sites, and social events);
- Provide mandatory training for all Staff and specific guidance for Managers on preventing, identifying, and addressing inappropriate behaviour;
- Maintain clear, accessible, and confidential reporting channels for all incidents; and
- Regularly monitor and review workplace culture and feedback.

Third-Party Harassment

21. Staff are protected from harassment by **third parties**, including clients, customers, suppliers, contractors, and visitors.

22. VG&P maintains a strict zero-tolerance policy towards third-party harassment. If you experience or witness harassment by a third party:

- You are encouraged to report the matter immediately to your Manager or the Studio Manager.
- You will be supported by the Employer, and raising a complaint will not negatively impact your role, career progression, or standing with VG&P.
- The Employer will investigate and take appropriate action, which may include issuing formal warnings to the third party, removing the individual from premises/projects, or terminating business contracts with the third-party organisation.

Disability Discrimination and Reasonable Adjustments

23. **Disability Discrimination** includes direct or indirect discrimination, discrimination arising from disability (less favourable treatment because of something arising in consequence of a person's disability without objective justification), and a failure to comply with the duty to make reasonable adjustments.
24. **Disabled Persons & Disclosures:** Any Staff member who considers that they have or may have a disability is strongly encouraged to speak with the Studio Manager. Disability includes any physical or mental impairment that has a substantial and long-term (lasting or likely to last 12 months or more) adverse effect on your ability to carry out normal day-to-day activities. Disclosure will be treated confidentially as far as reasonably practicable, and handled with sensitivity, privacy, and respect.
25. **Reasonable Adjustments:** VG&P will consult with disabled Staff members to identify and implement reasonable adjustments to remove or minimise disadvantages faced in the workplace, during recruitment, or in fulfilling job responsibilities. If a requested adjustment is deemed unreasonable, the Employer will explain the reasons clearly and work with the individual to explore alternative solutions.
26. **Managers:** Managers who know or suspect that a team member has a disability or requires workplace adjustments must consult the Studio Manager to ensure all legal duties and support measures are met.

Making Employment Decisions Fairly

27. VG&P recruits, promotes, and manages all staff on the basis of objective, job-related criteria, merit, and legitimate business requirements.
28. Managers must only stipulate criteria or conditions for employment decisions (including selection, promotion, redundancy, and working arrangements) that are necessary for the role and proportionate to achieving a legitimate business aim.

Recruitment & Selection

29. Managers involved in recruitment must:
- Specify criteria that directly reflect genuine role requirements and business needs. Shortlisting should involve more than one person wherever practicable;
 - Advertise vacancies broadly to reach diverse candidate pools, avoiding informal or word-of-mouth recruitment that restricts open competition;

- Review job advertisements carefully to avoid stereotyping or language that unjustifiably discourages specific groups from applying;
 - **Pre-Employment Health Enquiries:** Refrain from asking applicants about health, sickness absence, or disability prior to making a job offer, **except** where permitted by law:
 1. To establish if reasonable adjustments are needed for the recruitment/interview process itself;
 2. To establish if the applicant can carry out a function intrinsic to the role; or
 3. For equal opportunities monitoring purposes.
 - Refrain from asking candidates questions about Protected Characteristics (such as plans for children, marital status, age, or religious beliefs);
 - Avoid assumptions about immigration status based on appearance, accent, or origin; and
 - Maintain objective written records of decision-making reasons at each stage.
30. **Right to Work Verification:** VG&P is legally required to verify that all employees have the right to work in the UK prior to starting employment by inspecting valid documentation in a uniform, non-discriminatory manner regardless of apparent nationality or background.

Training, Career Development, and Promotion

31. Training needs will be identified through standard appraisal processes. All Staff will have equal access to training and development opportunities to support their role and career progression.
32. Promotion decisions will be made strictly on merit using objective criteria linked to business needs.

Terms, Conditions, and Part-Time / Fixed-Term Staff

33. Terms of employment, benefits, and workplace facilities will be reviewed regularly to eliminate unlawful barriers. Part-time and fixed-term staff will receive equal treatment and pro-rata terms compared to full-time or permanent counterparts in equivalent roles, unless different treatment is objectively justified.

Reporting Discrimination, Harassment, or Victimisation

34. **Raising a Grievance:** If you believe you have experienced or witnessed discrimination, harassment, or victimisation, you are encouraged to raise the matter under the Employer's **Grievance Procedure** or directly with the Studio Manager.
35. **Duty to Report:** All Staff share responsibility for fostering an inclusive environment. If you observe or become aware of discriminatory behaviour, harassment, or victimisation directed at others (including by third parties), you should report it to the Studio Manager.
36. **Confidentiality:** Reports and complaints will be handled with appropriate confidentiality. While investigating or addressing complaints may require sharing relevant details with involved parties, VG&P will take reasonable steps to protect your identity if requested and where feasible.
37. **Protection from Retaliation:** Staff who raise a complaint or report discrimination in good faith will be protected from retaliation or victimisation. Raising a concern in good faith will not adversely affect your job security, prospects, or treatment at VG&P, regardless of the outcome.
38. **Misconduct:** Deliberately making a false allegation in bad faith constitutes a serious disciplinary offence and will be dealt with under the Employer's Disciplinary Policy. Any member of Staff who retaliates against or victimises someone for raising or supporting a complaint will be subject to disciplinary action, up to and including summary dismissal for gross misconduct.
39. **Precautionary Measures:** During investigations into harassment or serious discrimination allegations, it may be necessary to implement temporary measures, such as reassigning duties or asking a staff member to work from home on full pay, to ensure a fair and safe investigation process.

Non-Compliance and Disciplinary Action

40. Any breach of this policy or failure to comply with equal opportunities standards will be treated as a serious matter and is likely to result in disciplinary action, up to and including summary dismissal.
41. Staff should note that:
- Individuals can be held **personally liable** under equality legislation for acts of discrimination, victimisation, or harassment committed against colleagues or third parties; and
 - Severe cases of harassment or stalking may also constitute a criminal offence under UK law.

42. Policy Review and Feedback

- 43. The board of directors has overall oversight of this policy and will review its effectiveness regularly in line with legal updates and organisational needs.
- 44. Staff are encouraged to provide feedback or suggest improvements to this policy at any time by contacting the Studio Manager.

Date: September 2026

Signed:

A handwritten signature in black ink, appearing to be 'EC' followed by a long horizontal stroke.

Edward Carpenter
Company Director
VG&P