

Equality diversity and inclusion policy

Our commitment

Stephensons is committed to promoting equality diversity and inclusion, providing equal opportunities in employment and avoiding unlawful discrimination in employment and against clients. We are committed to creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect.

This policy is intended to assist the Firm to put these commitments into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination and promote equality and inclusion in the workplace.

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. The Firm has a separate dignity at work policy, which deals with these issues.

As part of our commitment, we will take reasonable steps to:

- Promote awareness and provide training to all staff and all managers on all aspects of equality and diversity and inclusion in the workplace.
- Apply the principles of equity to all staff and all job applicants so that there is equality of opportunity.
- Our aim is that no individual is denied employment opportunities for reasons unrelated to ability.
- Establish programmes and processes that ensure a diversity of candidates at all career stages beginning with recruitment, including the development and promotion of talent through to the appointment of senior leadership and partnership.
- Implement all internal policies and procedures (on a fair and impartial basis).
- Create an inclusive working environment that is sensitive to the needs of staff of differing cultures, religions, and beliefs. For example, in connection with festivals, religious observance and dress.
- Make reasonable adjustments to enable employees with disabilities to function effectively and to their full potential.

- Ensure that all work environments are free from all forms of discrimination, harassment, intimidation or bullying.
- Monitor how this policy is working in practice.

The law

In implementing this policy Stephenson is committed to complying with the Equality Act 2010 and Principle 9, Chapter 2 of the Solicitors Code of Conduct 2011.

You must not unlawfully discriminate against or harass other people, including current and former staff, job applicants, clients, customers, suppliers and visitors because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

Employees should not discriminate against or harass a member of the public in the provision of services. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the

detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

Discrimination due to perception is where an individual is directly discriminated against or harassed based on a perception that he or she has a particular protected characteristic when he or she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he or she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. There is no longer a need for a complainant to compare his or her treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Discrimination Arising from a Disability arises when an individual is treated less favourably because of something arising out of their disability. This would include for example, the dismissal of an employee who required time off work in order to undergo medical treatment for their condition.

Equal opportunities in employment

The Firm will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for

candidates with a disability. When recruiting or promoting, the Firm will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Our recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.

The Firm will consider any possible indirectly discriminatory effect of its standard working practices, including:

- the number of hours to be worked
- the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices or flexible work requests and will refuse such requests only if the Firm considers it has good reasons, unrelated to any protected characteristic, for doing so.
- The Firm will comply with its obligations in relation to statutory requests for contract variations or flexible work requests.
- The Firm will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our Firm, we will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality, diversity and inclusion.

The Firm cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the Firm may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group that the Firm identifies as being under-represented in particular types of job.

Proof of Work

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the HR Department or UK Visas and Immigration.

Partners

Arrangements and procedures for selecting partners, their terms and conditions of partnership, access to benefits, facilities or services and termination arrangements will be reviewed and amended where necessary to prevent discrimination and promote diversity and inclusion.

Dignity at work

The Firm has a separate dignity at work policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with.

Clients, suppliers and other people not employed by the Firm

The Firm will not discriminate unlawfully against clients using or seeking to use facilities or services provided by the Firm.

Employees should report any bullying or harassment by clients, suppliers, visitors or others to their manager who will take appropriate action.

Barristers and Other Experts

Barristers and other Experts will be instructed on the basis of their skills, experience and ability. The Firm will not, on any of the forbidden grounds, avoid briefing a barrister, and will not request barristers' clerks to do so. Clients' requests for a named barrister should normally 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 age; 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.

Training

The Firm will provide training in equality diversity and inclusion to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

The Firm will provide training to all existing and new employees and others engaged to work at the Firm to help them understand their rights and responsibilities under the dignity at work policy and what they can do to help create a working environment free of bullying and harassment. The Firm will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

Training needs will be identified through regular appraisals which will be based entirely on an objective assessment of performance and will not be influenced by any Protected Characteristics that an employee may have. Employees will be given appropriate access to training to enable them to progress within the Firm and all promotion decisions will be made on the basis of merit.

Workforce composition, training and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the specific needs of disadvantaged or underrepresented groups.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all who should have access to them and that there are no unlawful obstacles to accessing them.

Disabilities

We encourage staff to tell us about any condition that is or may likely amount to a disability so that we can support you as appropriate.

If any employee experiences difficulties at work because of their disability, we would encourage them to speak to their line manager or the HR Department to discuss, so consideration can be given to matter such as any reasonable adjustments that would help overcome or minimise the difficulty. A line manager or the HR Department may wish to consult with the staff member and their medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate an employee's needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

Part-time and fixed-term staff

Part-time and fixed term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Your responsibilities

Every employee is required to assist the Firm to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Firm for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or clients are disciplinary offences and will be dealt with under the Firm's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Manager Responsibilities

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to diversity, equity and inclusion.

Grievances

If you consider that you may have been unlawfully discriminated against, you may use the Firm's grievance procedure to make a complaint. If your complaint involves bullying or harassment, the procedure is modified as set out in the dignity at work policy and the dealing with formal complaints of bullying and harassment procedure.

The Firm will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Use of the Firm's grievance procedure does not affect your right to make a complaint to an employment tribunal.

There must be no victimisation or retaliation against staff who complain about or report discrimination bullying or harassment. If you believe you have been victimised for making a complaint or report of discrimination bullying and/or harassment or have witnessed it happening to someone else in the workplace, you should raise this through our Grievance Procedure.

We encourage the reporting of all types of potential discrimination, harassment or bullying, as this assists us in ensuring that diversity, equity and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.

Monitoring and review

This policy will be monitored periodically by the Firm to judge its effectiveness and will be updated in accordance with changes in the law. In particular, the Firm will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will review its Equality and Diversity policy in accordance with the results shown by the monitoring. If changes are required, the Firm will implement them.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

Responsible for this policy

Kerry Leigh is responsible for maintaining this policy.