

Equal Opportunities Policy

In this Policy, **Avado** means Avado Group and its subsidiaries, namely Avado Learning Limited, Avado Apprenticeships Limited, and FastFutures Limited.

Equal Opportunities

We are an equal opportunities employer committed to promoting equality of opportunity in all aspects of employment. Anyone who works here, applies for a job or has any other dealings with us will be given equal opportunity regardless of sex or sexual orientation, marital or civil partnership status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, age, disability or gender reassignment (Protected Characteristics).

Our equal opportunities policy covers all employees, consultants, contractors, casual workers and agency workers. It does not form part of any employee's contract of employment and we may review and amend it from time to time.

We really value diversity and feel that it is in everyone's interests to have a harmonious and respectful workplace. It is our aim to provide a creative working environment where everyone has an equal opportunity for success based on merit and where everyone is treated fairly and with dignity, free from discrimination, harassment and victimisation.

Without wanting to labour the point we expect you to treat others as you would wish to be treated, and this includes how you act outside of work where your behaviour might reflect on us and bring BC Arch Limited into disrepute by association.

Discrimination

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. 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.

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be homosexual.
- Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Bullying and harassment is covered in more detail below.



† +44 (0)20 8080 6482 e info@avadolearning.com w www.fastfutures.com

Avado Apprenticeships Limited T/A FastFutures. Registered in England with number 08151723. Registered office: Scale Space, Imperial College White City Campus, 58 Wood Lane, London W12 7RZ. VAT Registration number: 918560018



- Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or

Bullying and Harassment

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

Please remember that bullying or harassment may take many forms and range from mild banter to sexual connotations or to actual physical violence. The terms are really defined by how the person who is on the receiving end feels about the behaviour, not what you intended by it. A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment. It is also worth remembering that in the eyes of the law you could be held personally responsible for any behaviour that someone complains about.

Communication and engagement

Our commitment to equality, diversity and inclusion will, at the very least, be highlighted in our prospectus, annual self-assessment report, and annual equality information report.

Our 'commitments to inclusion and belonging' working document is live and accessible to all those engaged, employed or working with us. All those engaged with us will be made aware of our approach, and the actions required for its successful installation.

Additionally, our leadership development programme and associated collateral (e.g. Leadership Outcomes) promote not only the importance, but the cultural significance, of equality, diversity and inclusion.

Beyond this, many of our feedback loops with clients and learners will proactively and deliberately inquire as to the lived experience of our approach to equality, diversity and inclusion. Finally, all those employed here are asked regularly (at least six-monthly) about their perceptions of our equality, diversity and inclusion practices, through the weekly engagement pulse survey, currently administered by *OfficeVibe*.

Procedure for Dealing with Discrimination, Bullying and Harassment

If you feel that you are being bullied or harassed or have suffered discrimination in any way, consider whether you feel able to let the person know that you do not find their behaviour acceptable. If this does not resolve the matter or they continue to act in a way that you find

inappropriate or it is too difficult or embarrassing to approach the person, then you should let your Manager know as soon as possible so that they can investigate the matter.

If, however, you feel that the first incident is very serious and that the person who has acted in this way should reasonably know that their behaviour is unacceptable then you do not have to wait for it to happen again. If this is the case, then please tell your Manager about it as soon as possible and follow up your complaint in writing in line with the Problem Solving at Work guide.

If you do not want to speak to your Manager about the incident, or they are the culprit, then you should speak to a member of the PX Team (if you are employed or engaged with Avado/BC Arch Ltd) or Safeguarding (if you are an apprentice.) Generally speaking, the decision as to whether to progress a complaint is up to you. However, we have a duty to protect all staff and we may pursue the matter independently if we consider it appropriate to do so.

Harassment or Bullying by a Third Party

If the bullying or harassment is by a third party, such as a client or supplier, you may choose whether you wish to take the informal approach in the first instance, to see if a direct request to stop will resolve the problem. If this does not work, or if you do not feel comfortable speaking to the third party, then you should raise your concerns directly with your Manager, who will take reasonable steps to prevent it from happening again.

Compliance

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination, bullying, harassment or victimisation may amount to gross misconduct resulting in dismissal.

There must be no victimisation or retaliation against staff who complain about discrimination, bullying or harassment. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

Document Control

DOCUMENT NAME	VERSION	MASTER COPY LOCATION
Equal Opportunities Policy	1.6	Avado Group SharePoint

Unless stated within the body of this document, the owner is responsible for maintaining document control and facilitating compliance; as well as the management of review, updates and changes.

OWNER	ROLE / ORGANISATION	CONTACT
Jasper Joyce	CEO	Jasper.Joyce@avadolearning.com
AUTHOR	ROLE / ORGANISATION	CONTACT
Keith Harvey	Head of Compliance	Keith.Harvey@avadolearning.com

Revision History

Version	Date	Amended By	Summary of changes
V1.4	29/07/19	Keith Harvey	New Base Line
V1.5	12/08/21	Keith Harvey	Brand and content update
V1.5	17/08/21	Dean Corbett	Content update
V1.6	06/02/23	Keith Harvey	Brand and content update

Approvals

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	Approval Status	Signature
V1.6	2023-6-7	Jasper Joyce	CEO	Approved	 <small>Jasper Joyce (Jun 8, 2023 13:59 GMT+1)</small>