



Equal Opportunities & Diversity Policy

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01 - Introduction

This policy provides detailed information and procedures in relation to Equal Opportunities & Diversity at On The Sly. Please ensure that you are familiar with its content and ask the contact below for further information should you have any questions.

Every effort will be made to ensure the policy is reviewed and reissued in response to future changes in the law. In the event that legal requirements supersede the content of this policy, legal requirements will be followed.

For further information please contact:

Chris Thorpe
Director
On The Sly Music Ltd

02 – Equal Opportunities

- 2.1 On The Sly is an Equal Opportunities employer. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination because of Protected Characteristics as defined by the Equality Act 2010. We have adopted this policy as a means to achieving these aims.
- 2.2 The Protected Characteristics are:
 - 2.2.1 Age
 - 2.2.2 Disability
 - 2.2.3 Gender Reassignment
 - 2.2.4 Race
 - 2.2.5 Religion or Belief
 - 2.2.6 Sex
 - 2.2.7 Sexual Orientation
 - 2.2.8 Marriage and Civil Partnership
 - 2.2.9 Pregnancy and Maternity
- 2.3 We aim to ensure that our employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria.

03 – Discrimination

- 3.1 You must not discriminate against or harass other people, and this includes current and former Colleagues, job applicants, clients, customers, suppliers, distributors and visitors, whether you interact with them in the workplace or outside the workplace.

- 3.2 On The Sly has a zero tolerance policy towards discrimination. Discrimination includes:
- 3.2.1 Direct Discrimination – When someone is treated less favourably than another person because of a Protected Characteristic.
 - 3.2.2 Associative Discrimination or Discrimination by Association – Direct discrimination against someone because they associate with another person who possesses a Protected Characteristic.
 - 3.2.3 Discrimination by Perception – Direct discrimination against someone because it is thought they possess a particular Protected Characteristic even if they do not actually possess it.
 - 3.2.4 Indirect Discrimination – A provision, criterion or practice that applies to everyone but adversely affects people with a Protected Characteristic more than others, and is not justified.
 - 3.2.5 Harassment – Unwanted conduct related to a relevant Protected Characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. You may complain of such offensive behavior even if it is not directed towards you personally.
 - 3.2.6 Harassment by a Third Party – Harassment of employees by third parties such as customers or clients.
 - 3.2.7 Victimisation – When an employee is treated less favourably because they have made or supported a complaint or raised a grievance about unlawful discrimination or are suspected of doing so.
 - 3.2.8 Disability Discrimination – Any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.
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04 – Commitment

- 4.1 We are committed to ensuring that all of our employees and applicants for employment are protected from unlawful discrimination in employment.
- 4.2 On The Sly approaches recruitment, promotion and other selection exercises such as redundancy on the basis of merit and against objective criteria to avoid discrimination. If possible, more than one person will be involved in shortlisting candidates and/or any selection exercises.
- 4.3 Person and job specifications will be limited to those requirements, which are necessary for the effective performance of the job.
- 4.4 On The Sly takes steps to ensure that vacancies are advertised as widely as possible. We want to attract applications from the best possible candidates, regardless of particular Protected Characteristics. We seek to ensure that advertisements avoid stereotyping or using wording that may discourage particular groups from applying.

- 4.5 Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary and relevant. We will not ask job applicants questions which might suggest an intention to discriminate on the basis of a particular Protected Characteristic.
- 4.6 It is also our policy not to ask job applicants questions about their health or disability before making a job offer, except in limited circumstances allowed by law (e.g. to see if any adjustments are needed at interview because of a disability).
- 4.7 All employees have the right to equality of opportunity and a duty to implement this policy. We take a strict approach to breaches of this policy, which will be dealt with as a disciplinary matter. Serious cases of deliberate discrimination may amount to gross misconduct.
- 4.8 Anyone who believes that he or she may have been disadvantaged on discriminatory grounds should raise the matter through the Company's grievance procedure.
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05 – Display of Provocative or Offensive Material

- 5.1 On The Sly does not tolerate the display of provocative or offensive material on its premises, or the downloading of such material from the internet.
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06 – Disabilities

- 6.1 If you are disabled or become disabled, we encourage you to tell us so that we can consider what reasonable adjustments or support may be appropriate.
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07 – Part-time & Fixed-term

- 7.1 Part-time and fixed term colleagues should be treated in the same way as full-time or permanent Colleagues and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.
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08 – Equal Opportunities Monitoring

- 8.1 We do not actively request personal information in regard to equal opportunities monitoring however there are some Protected Characteristics against which the Company will hold information. For example; your date of birth is required in order to administer the Company pension scheme [and other Benefits] and details of planned Maternity Leave would be required in order to administer any entitlement to leave and pay etc.
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09 – Breaches of this policy

- 9.1 Any staff member who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our contractual relationship with any other staff member if they breach this policy.
- 9.2 If you feel that you have been a victim of discrimination, please do not hesitate to raise the matter through the On The Sly Grievance Procedure of On The Sly Anti-Harassment and Bullying Policy. We will treat all complaints in confidence, investigate them as appropriate and apply any disciplinary procedures and penalties without discrimination.
- 9.3 On The Sly does not tolerate victimisation or retaliation against any staff member who complains about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and will be dealt with under our disciplinary procedures.