

Black Country Consortium Ltd Equality Policy

The Black Country Consortium believes that by understanding and responding to the diverse needs of its potential and existing employees, providing an environment which eliminates discrimination in all its forms as well as positively promoting equality, it will attract and retain a motivated and multi-skilled workforce to provide a good quality service.

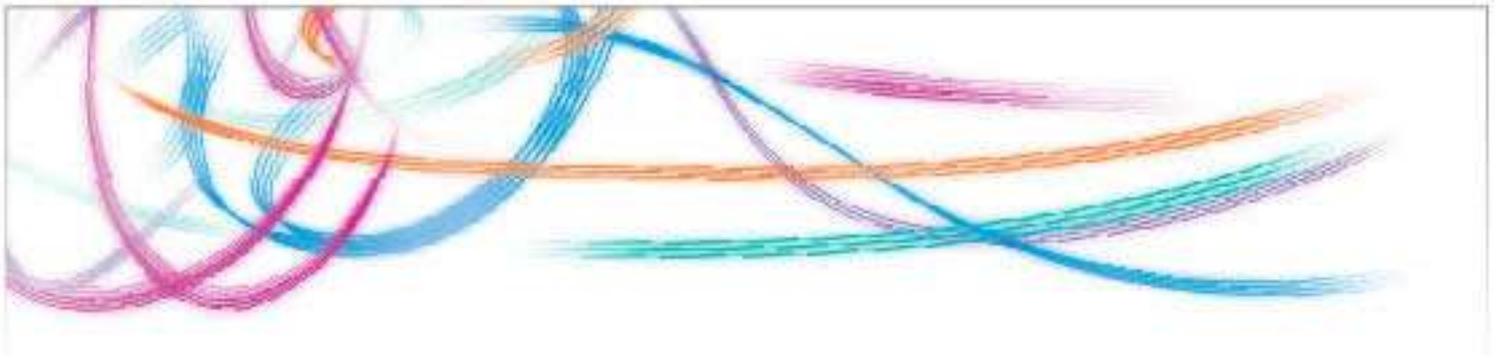
This document sets out an ongoing progressive agenda, and in doing so attempts to embrace the following themes:

- The cultural diversity of the Black Country area which should not only be valued but be reflected in its workforce at all levels.
- The strategy of valuing employees is a key area of the successful implementation of this Policy, and in terms of employees delivering even better services.
- That equality of opportunity cannot be realised without the involvement and commitment of all parties and a common understanding of the vital and essential role of Equal Opportunities in context of the Black Country Consortium corporate values. In particular, the recognition that the role of managers is crucial in delivering the objectives of the Policy to achieve the corporate values.
- The workforce should reflect the composition of the wider community at all grades and levels.

Policy Statement

Black Country Consortium Limited is committed to achieving the highest standards of employment practice. Equality of opportunity for all sections of the workforce is an integral part of this commitment.

The Black Country Consortium will not tolerate less favourable treatment on grounds of: sex, race, colour, nationality, ethnic or national origin, disability, marital status, sexual orientation, gender re-assignment, responsibility for dependants, age, trade union or political activities, religion or belief, spent offences or any other reason which cannot be shown to be justified.



The Black Country Consortium seeks to provide a positive role model for other organisations in the community

To achieve these aims the Black Country Consortium will continue to:

- ensure that its employment practices provide equality of opportunity for both current and prospective employees and promote a work culture that values diversity. This principle will apply to: recruitment and selection, training and development, promotion and redeployment and all other terms and conditions of employment. Steps will be taken to address the under-representation of employees. To achieve this positive action will be introduced as contained in legislation and their effectiveness will be monitored and reviewed. A representative workforce at all levels and grades provides greater sensitivity to and understanding of community needs.
- use the Equality Act 2010, Race Relations Act 1976; the Sex Discrimination Act 1975; the Disability Discrimination Act 1995 and any other appropriate legislation as a framework for action to support initiatives

Policy Aim

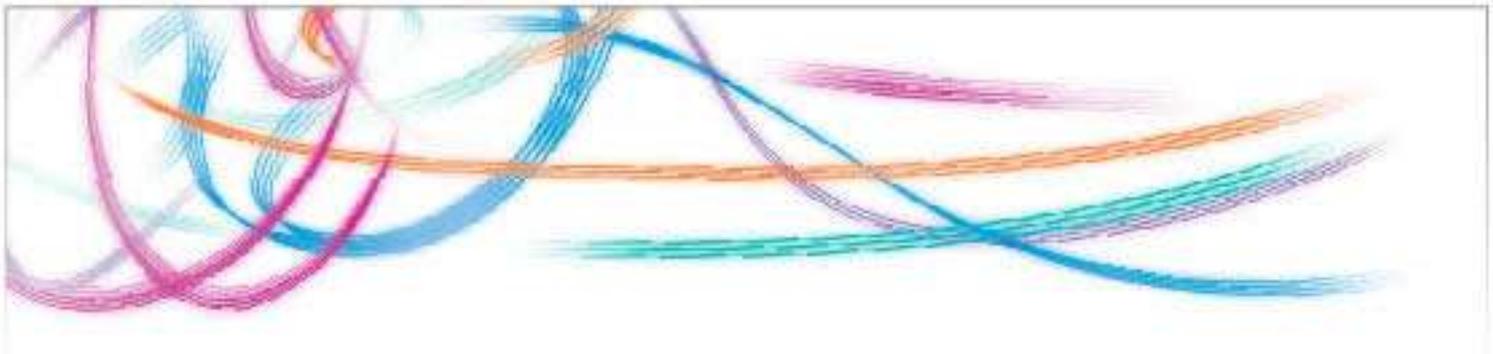
The purpose of this policy is to provide a framework within which the potential and abilities of all employees are fully utilised, regardless of race, religion and belief, gender, disability and sexual orientation.

This policy is intended to ensure that the Black Country Consortium meets its legal obligations Equality Act 2010, (Equal Pay Act 1970, Sex Discrimination Act 1975 (including gender re-assignment regulations 1999), Race Relations Act 1976, Disability Discrimination Act 1995, Employment Equality (Religion and Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003) and complies with the various codes of practice.

Aims and Objectives

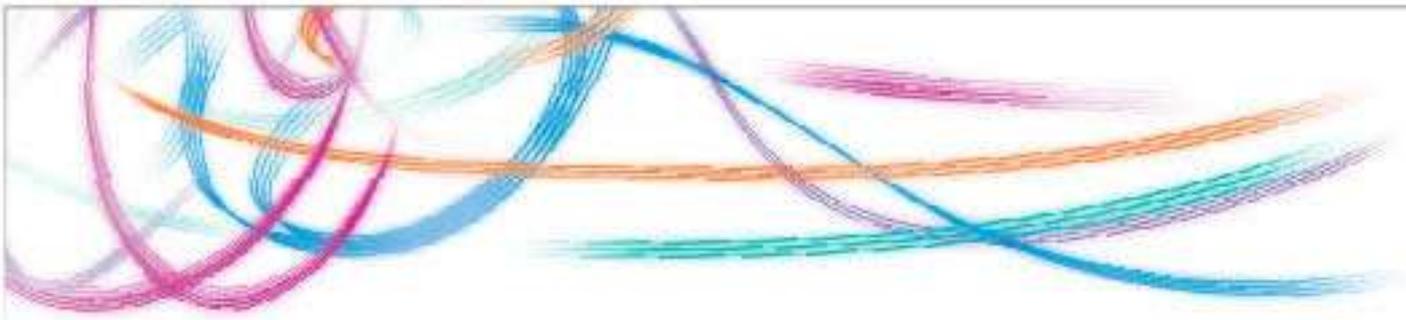
Through its Policy, the Black Country Consortium aims to:

- reinforce the Black Country Consortium position as a 'exemplar employer' and its unique position as a provider of services and a source of employment opportunities. To externally publicise the corporate application of equal opportunities in a bid to increase



awareness. To maintain the focus of equality through the corporate Marketing Strategy.

- ensure that equality issues remain high on the Black Country Consortium priorities and systematic ongoing actions are developed to address these issues.
- ensure that responsibilities are recognised and acted upon by the Chief Executive and employees within the organisation of their collective and individual roles in the pursuit of equality of opportunity. Equality personal objectives to be clearly outlined on Performance@BCC
- draw together a human resource good practice guide and to set out a proactive agenda in which discrimination is recognised and challenged as an organisational issue which necessarily demands an organisational response, firmly dealing with those who act in a discriminatory manner.
- learn from mistakes, share that learning and incorporate it into good practice guidance.
- give a high priority to the training and development of employees in the field of equality and related issues.
- work in partnership with community groups and other agencies to remove any barriers to fair and equal treatment.
- apply these principles to work undertaken for the Black Country Consortium by all external contractors and other organisations in receipt of Black Country Consortium funding through the use of contract agreements where a commitment to BCC Ltd's Equality Policy is accepted fully.
- set objectives, evaluate and monitor progress (through staffing trends) and report to the Chief Executive.
- Periodically review its Recruitment and Selection policy to ensure all possible reasonable adjustments to remove access barriers to employment and training and undertaken. The approach to recruitment advertising will be reviewed to ensure BCC Ltd attracts a diverse group of potential applicants. Selection criteria and procedures will be kept under review to ensure that individuals are



selected, promoted and treated on the basis of their relevant merits and abilities. All employees will be given equality of opportunity within the Consortium's services and will be encouraged to progress within the organisation. Applications from disabled persons who have the necessary attributes for the post will be welcomed. An Interview Guarantee Scheme is the company's guarantee to interview all applicants with a disability who meet the minimum essential criteria for the job.

- Periodically review in conjunction with the Joint Consultative Committee all staff policies and procedures and undertake Equality Impact Assessments.
- To identify equality targets - internal/external and monitor performance. Equality targets to be subject to scrutiny as part of the corporate evaluation process.

Scope of the Policy

- This policy embraces equality of opportunity as a strategic way of transforming and improving the composition of the workforce.
- Regular workforce monitoring will be undertaken by a body appointed by the Chief Executive to determine positive action measures. The effectiveness of the positive action measures will be reported to the Chief Executive.

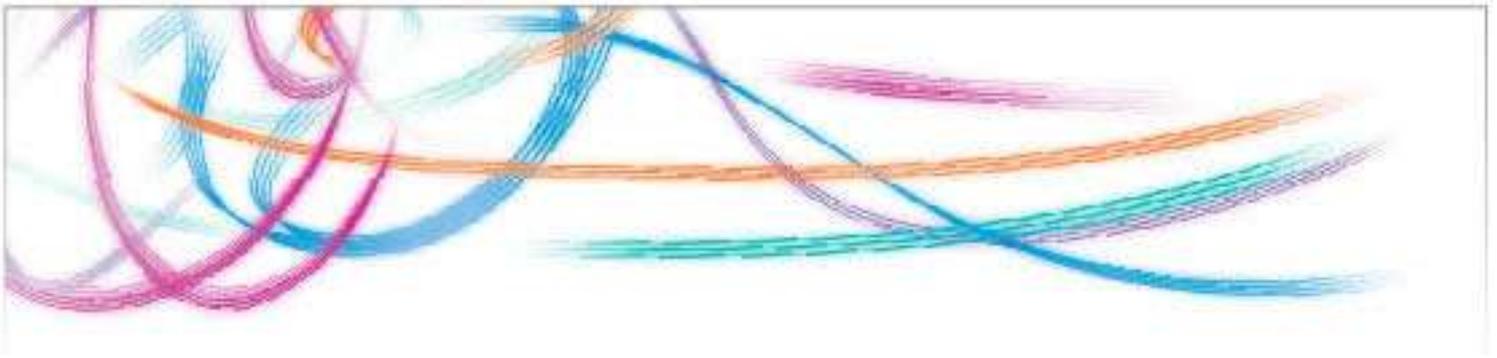
Implementing the Policy

In the spirit of devolving levels of responsibility for the policy to employing managers, who shall be responsible for the implementation, monitoring and communication of the policy, overall responsibility for the policy rests with the Chief Executive.

Obligations of Employees

Employees must be aware of their responsibilities as well as the Black Country Consortium officers to the commitment to equal opportunities. These obligations include:

- co-operation with measures introduced in consultation with Trade Unions to ensure there is equality of opportunity and non-discrimination in employment and service delivery matters;



- ensuring that all employees with responsibility for service delivery arrangements, selection decisions in recruitment, promotion, transfer and training, do not discriminate, failing which appropriate action will be taken against that employee.
- not persuading or seeking to persuade other employees, unions or management to practice unlawful discrimination in employment matters;
- drawing the attention of management to suspected discriminatory acts or practices in employment matters suggesting strictest action against perpetrators of discriminatory practice and
- offering protection to employees from victimisation who have made complaints or provided information about instances of discrimination or harassment.

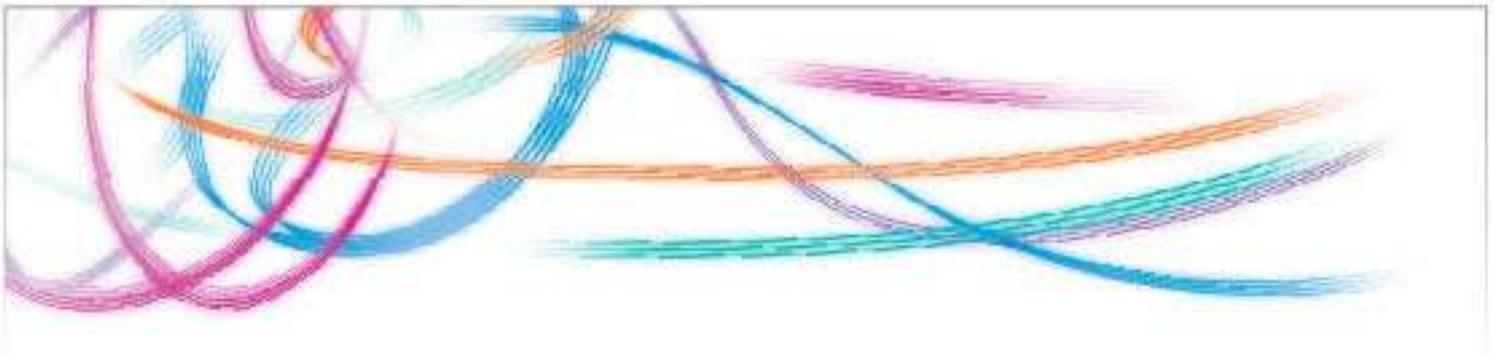
What does positive action mean?

The law as it currently stands allows employers to take action, which enables people to compete equally for jobs and to participate equally whilst they are in the Company's employment.

BCC Ltd is committed to ensure positive action is taken to enable under-represented groups to achieve their potential.

Key areas for positive action

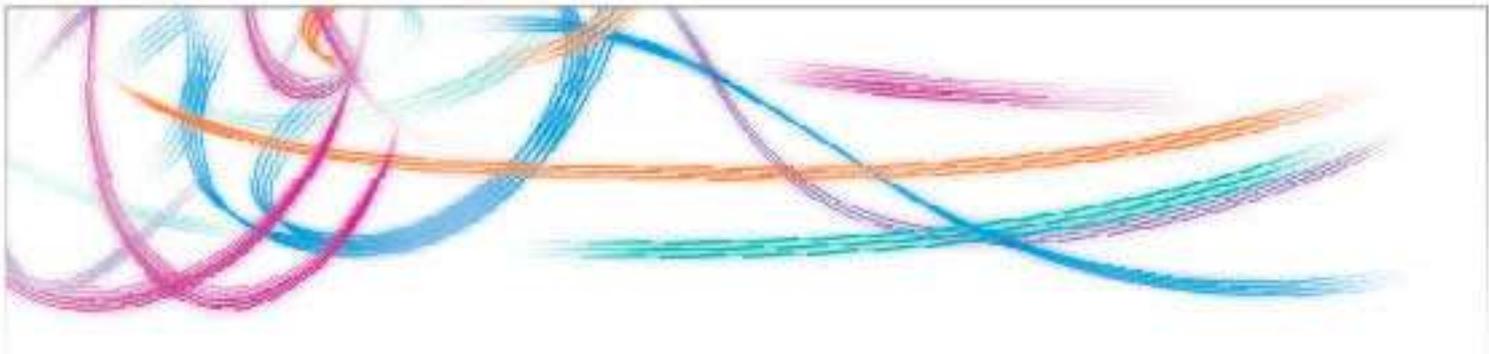
- The Company recognises that it must take certain steps, or positive measures, which go beyond good practice and existing legislation, to achieve the overall objectives of the policy. We need to turn words into practice and this means establishing and implementing programs designed to eliminate discrimination and to promote equality generally. This will be achieved through:
- Having a clear Policy commitment to the promotion of equality in our workforce and to the community we serve regardless of race, gender, disability, sexual orientation etc.
- Using positive statements to encourage awareness raising among employees in addition to have positive action programs to encourage career development and retention of existing employees from these groups.



- Ensuring that wherever possible reasonable adjustments are made to working environments to ensure the retention of an employee who becomes disabled.
- Having established structures, which are advertised to ensure that cases of discrimination and harassment in the workplace are dealt with appropriately through the harassment and disciplinary procedure.
- Monitoring and examining employment trends, introduce a variety of initiatives to rectify and improve opportunities for women, disabled and existing black employees.
- Encouraging disadvantaged groups to meet, consult and be involved in the decision making process within the departments of the Company and in relation to the reviewing of policies, restructuring or redirecting resources etc.

Monitoring and Review

This policy and supporting action/implementation plan will be reviewed on an annual basis and submitted to Guarantee Members and the Board of Directors for approval and adoption in addition to an update on the achievement of the corporately set equality targets. Any future policy changes will be published to all staff and a revised policy issued to all engaged sub-contractors.



Appendix A

ESF Sub-contractors.

All ESF sub-contractors will be asked to provide a copy of their Equal Opportunities policy during any application process. This policy will be assessed against a checklist to ensure they not only adhere to Black Country Consortium's Equality Policy but will also meet the appropriate legislative criteria. BCC Ltd will support organisations who do not meet these requirements. Equal opportunities training will also be provided to successful applicants as part of the capacity building workshops that sub-contractors are contractually obliged to attend.

Equality targets exist that are representative of the relevant groups in the Black Country, it is therefore expected that all sub-contractors will seek to achieve these target at a local level, where appropriate. These are as follow:

- 51% Females
- 22% Disabled
- 31% Ethnic minorities
- 34% Economically Inactive
- 12% Lone Parents

In order to ensure that these targets are reached sub-contractors will be asked to provide an assessment of the categories and ethnic background of participants they anticipate will benefit from the programme. Projects will then be marked according to the answers they give. Projects will be monitored in relation to their equality targets on a monthly basis. Where there is underperformance projects will be contacted to establish the causes in order to gauge the level of support required from the BCC Ltd.

ESF Programme Monitoring

All ESF programmes carried out by BCC Ltd will be monitored on a monthly basis in terms of the overall targets above, each target being a RAG (red, amber, green) rating. Where targets are in amber or red status the project manager will be required to establish the cause in order to gauge the action needed to be taken to meet targets, this could include encouraging organisations who target specific communities to apply for future funding.



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