

# Equal Opportunity Policy

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**DOCUMENT STATEMENT:**

All Translink Group Corporate Procedural Documentation (policies, procedures and guidelines) should be consistent in terms of development, approval, implementation, communication, control and review in line with these guidelines.



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**Version Control Record**

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1.2	HR Services Manager	13.10.2021	Updated HR contacts
	HR Management Team	Nov 2021	Reviewed and approved by HR mgmt.
	EDI Advisor	April 2022	Some wording changes in line with modern terminology

This is a controlled document. Whilst this document may be printed, the electronic version is maintained within the Corporate Records Centre within Sharepoint by the Policy Owner.

**1. Introduction**

Throughout this Policy, the words ‘Translink’ ‘Company’ and/or ‘the Group’ refer to all corporate entities under the ownership of the Northern Ireland Transport Holding Company (NITHC). This includes the parent Company and each subsidiary either individually or taken together as a group.

**2. Scope**

Translink is committed to the provision of equality of opportunity and to a pro-active and inclusive approach to equality, which supports and encourages all under-represented groups, promotes an inclusive culture, values diversity, and secures fair participation throughout its workforce for all employees and applicants.

As an equal opportunity employer our aim is to create a working environment in which the abilities of all employees are utilized to the full. Equal opportunity is about good employment practices and efficient use of our most valuable asset, our employees. Every manager and employee has personal responsibility for the implementation of this policy. We will not discriminate unfairly, either directly or indirectly, against any individual in matters of recruitment, dismissal, selection for redundancy or promotion, transfer, development or training, pay and, benefits, facilities, procedures and all other aspects of employment.

Translink will treat all job applicants and employees fairly and equally, and will not discriminate unlawfully on any of the protected grounds, which are: sex; gender reassignment; pregnancy or maternity; sexual orientation; -religious or similar philosophical belief; political opinion; marital or civil partnership status; having or not having dependants; age ; race (including colour, nationality, ethnic or national origins, being an Irish Traveller) or disability.

This policy applies to job applicants (internal and external) and all employees whether full time, part time, temporary or on fixed term employment.

**3. Policy**

Translink recognises and ensures compliance with its legal obligations under the Fair Employment and Treatment (NI) Order 1998 (as amended), Sex Discrimination (NI) Order 1976 (as amended), Equal Pay Act (NI) 1970 (as amended), Disability Discrimination Act 1995 (as amended), Race Relations (NI) Order 1997 (as amended), the Employment Equality (Sexual Orientation) Regulations (NI) 2003, The Equality Act (Sexual Orientation) Regulations (NI) 2006, and the Employment Equality (Age) Regulations (NI) 2006.

Translink recognizes its moral and social obligations to promote equality of opportunity within the local communities in which Translink locations operate and acknowledges the desirability that its workforce broadly reflects the diversity of the local population.

Translink has established employment policies, procedures and codes of practice designed to promote equality of opportunity and eliminate unfair discrimination. These will be subject to regular assessment by the Chief HR & Corporate Services Officer in order to examine how they affect under-represented groups and to identify measures to improve their effectiveness.

Translink seeks to promote a harmonious working environment and atmosphere in which no employee feels under threat or intimidated and will eliminate any conditions, procedures and individual behaviour that can lead to discrimination even where there was no intent to discriminate.

Any employee who believes that he/she has been treated unfairly within the scope of this Policy may raise the matter through our Dignity at Work Policy or the normal grievance procedure, as appropriate. Translink will not tolerate discrimination, harassment or bullying on protected equality grounds and as such, all complaints on these grounds will be dealt with seriously, promptly and confidentially. Internal procedures do not replace or detract from the rights of employees to pursue complaints of discrimination under the relevant employment legislation.

Our internal procedures do not replace the right to make a complaint to a tribunal, however we would encourage employees to raise their complaint under our internal Dignity at Work Policy or our internal grievance procedure first. Every effort will be made to ensure that employees who make complaints will not be victimised. Any complaint of victimization will be dealt with seriously, promptly and confidentially. Victimisation will result in disciplinary action and may warrant dismissal.

Translink is committed to appoint the best person for the job and in doing so we recognise that, in particular people with disabilities represent a valuable and untapped resource for our organisation. Furthermore, through our Code of Practice on the Employment of People with Disabilities ( Appendix 1), we aim to remove the barriers that prevent people with disabilities from succeeding and thereby helping them to maximize their full potential in the area of employment. In the case of employees who become disabled, Translink will endeavor to make reasonable adjustments for them as required by legislation.

When establishing criteria for recruitment and promotion to vacant posts, Translink will consider carefully whether any minimum or maximum number of years of relevant experience is necessary for effective performance in the job.

Translink does not apply a retirement age and applications for employment are welcome from any age group.

This Policy is made available to all new employees on appointment and is accessible to all employees via the intranet, employee app or through contacting their Line Manager.

#### **4. Responsibilities**

The Chief HR & Corporate Services Officer is responsible for arrangements for the provision of advice, training, guidelines for implementation, operation and development and for review of effectiveness as stated in section 3.

Managers are responsible for ensuring that this policy is implemented within their department and for dealing with any matters arising.

It is the responsibility of all employees to understand that the display or erection of flags, streamers, pictures, decorations or slogans which may cause offence to any employee is strictly prohibited and will lead to action under the disciplinary procedure.

All employees have a responsibility to accept their personal involvement in the practical application of the Translink Equal Opportunity Policy. All employees must treat each other with dignity and respect and must not commit any acts of unlawful discrimination or harassment against any other person. Failure to comply with these rules and regulations on equality of opportunity will lead to action under the Disciplinary Procedure and any employee found to have discriminated against any other employee, customer or person involved with Translink is liable to dismissal.

All our employees should discourage discrimination and harassment by making it clear that they find such behaviour unacceptable and by supporting co-workers who suffer such treatment. Any employee who is aware of any incident of discrimination or harassment should alert a manager or supervisor to enable us to deal with it.

### 5. Section 75 Duties

Translink is required to have due regard to the need to promote equality of opportunity between:

- persons of different religious belief; political opinion; racial group; age; marital status; sexual orientation; and
- between men and women generally; and
- between persons with a disability and persons without; and
- between persons with dependants and persons without

Also, Translink will have regard for the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

### 6. Training

Translink will provide equality training and guidance as appropriate (including induction training) for new appointees or those in positions of responsibility and will do all it can to promote good practice in this area in order to reduce the likelihood of discrimination or harassment occurring.

### 7. Monitoring and Review

Translink will monitor the composition of the workforce and job applicants as appropriate and such action as may be deemed necessary will be taken to redress any imbalance, including positive action.

Translink, through the Chief HR & Corporate Services Officer, will monitor the incidents of formal complaints under this policy and review them annually.

### 8. Related Policies and Documents

- Career Break Policy
- Code of Practice on the Employment of People with Disabilities
- Dignity at Work Policy
- Flags and Emblems Policy
- Flexible Working Policy
- Job Sharing Policy
- Voluntary Training Policy
- Company Guidelines on the Wearing and Selling of Poppies
- Transitioning at Work Policy

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**APPENDIX 1 - CODE OF PRACTICE ON THE EMPLOYMENT OF PEOPLE WITH DISABILITIES**

**1. Introduction**

To realise the aims of its Equal Opportunity Policy Translink is committed to developing and applying relevant supporting employment policies and practices to seek to ensure the promotion of equality.

Every day people with disabilities face barriers that most non-disabled people would never think about. These barriers are not just physical, but can be psychological caused by negative assumptions, attitudes and reactions by non-disabled people. With a major change in attitudes and small practical changes to the working environment, more people who may be currently excluded could be engaged and included within Translink. Accordingly through our Code of Practice we aim to reduce the barriers that prevent people with disabilities from succeeding and thereby helping them to maximize their full potential in the area of access to and within employment.

**2. Scope and Definition**

The definition of disability within the legislation is:

“someone who has a physical or mental impairment which has a substantial and long term adverse effect on his or her ability to carry out normal day-to-day activities.”

**3. Aims and Objectives**

This Code of Practice sets out the development and implementation standards of good practice for disabled people, as follows:

***Recruitment, Selection and Promotion***

Translink will take steps to ensure that people with disabilities who apply for jobs will know that they will receive a fair and equal opportunity. Translink will make reasonable adjustments to ensure our employment arrangements or premises do not put a disabled person at a substantial disadvantage compared with a non-disabled person.

Translink is therefore committed to:

- a) Employ people with disabilities on the basis of merit and in jobs suited to their aptitudes, abilities and qualifications;
- b) Shortlist any disabled applicant who meets the essential requirements of the post;
- c) Collaborate with the various disablement agencies with a view to seeking advice and support in recruiting and retaining disabled people.
- d) Use the Employers for Disability NI job bulletin board to promote Translink and refer potential applicants to the careers section on the Translink website, thereby encouraging applications from people with disabilities.
- e) Make appropriate reasonable adjustments to the recruitment process, e.g. modifying testing procedures, providing an interpreter.
- f) Introduce a Disability Placement Scheme for the training and potential employment of disabled people.
- g) Ensure staff involved in the recruitment process are properly trained in matters of equal

- opportunities including matters of disability.
- h) Ensure that employees with disabilities are given equal consideration for promotion according to their abilities.

### ***Training and Development***

Translink undertakes to:

- a) Ensure that people with disabilities have the same opportunity as other staff to develop their full potential within the organisation.
- b) Become involved in work experience, training and education/industry placements.
- c) Raise awareness of disability throughout the organisation, particularly through its “Dignity at Work Programme”.

### ***Introduction and Integration into the Workforce***

Translink will ensure the integration of disabled staff into the workforce by:

- a) On appointment, ensuring the induction of the disabled employee into the organisation and work of the department; and
- b) Providing accommodation and/or equipment i.e. reasonable adjustments, which are suitable for the needs of the disabled employee.

### ***Staff Becoming Disabled***

Employees who are disabled or become disabled in the course of their employment should inform Translink about their disability.

Translink undertakes to consult with employees who are disabled in their present employment. When deciding what reasonable adjustment can be made, consideration will be given to the cost involved and the practicality of making the adjustment. Some examples which Translink will consider making for employees (or potential employees) include:

- Adjustment to premises
- Flexible working
- Allocating duties to another person
- Altering working hours
- Assigning a different work place
- Modifying instructions or referral manuals
- Modifying procedures for selection testing or assessment
- Acquiring or modifying equipment or reference manual
- Providing a reader or interpreter
- Providing additional supervision or support
- Retraining
- Physical adjustments
- Amendment to policy or procedures

### ***Health Safety and Access to Buildings***

Translink will ensure, as far as is practicable, that disabled people have physical access to all its facilities and that employees with disabilities are provided with a safe environment in which to work.

***Monitoring***

Translink monitors its applicants, workforce and the effectiveness of this Code of Practice regularly. Equality monitoring reports are prepared by the Human Resources Division and action points determined by the Executive Team.

***Complaints***

Translink recognize fully the right of disabled people to complain about discrimination should it occur. Employee complaints should, in the first instance, be made under the established grievance procedure, to the manager in charge of the workplace.

**APPENDIX 2**

**Sex Discrimination, Gender Reassignment Guidance**

Employees should note that Translink fully endorse the requirements under this legislation and should any cases of discrimination or victimisation arise, this will be regarded as a serious matter and appropriate disciplinary action will be taken.

**Employee Support**

The Company has set up a system which will support any employee who comes within the remit of this legislation in their general employment. Should any employee require further information on the details of how the Company can support them, then they should contact in confidence any of the following Managers:-

Christine Burrows	HR Operations Manager	028 90277878
Michelle Reynolds	HR Business Partner	028 90277869
Joanne Murray	HR Business Partner	028 90277861
Carol Conn	HR Business Partner	028 90277862
Kate Fisher	HR Business Partner	028 90277862
Paula Ludlow	HR Services Manager	028 90277872
Jen Scott	HR Advisor	078 15484269
Paula Logue	HR Manager	028 90277871
Una Carson	Employee Support Officer	028 90277874

**Associated Documentation**

- Dignity at Work Policy