



Twin Group

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Company registration number: 3118260

VAT registration number: 668 2453 09

TWIN GROUP

Equal Opportunities Policy

January 2006

Group Travel | Work Experience in the UK | English Language Courses | Vacation Courses
Languages Abroad | Global Work Experience | Vocational Training

Twin Group is a trading division of: TWIN TRAINING INTERNATIONAL Ltd.
Registered Office Address: Holborn Hall, 100 Grays Inn Road, London, WC1X 8BY.





Page

Contents

| | |
|-------------------------------|----|
| Equal Opportunities Statement | 3 |
| Equal Opportunities Policy | 4 |
| -Foreword | 4 |
| -Valuing Diversity | 4 |
| -General Statements | 4 |
| -Twin Group Values | 5 |
| -Legislation | 5 |
| -Discrimination | 5 |
| -Victimisation | 7 |
| -Positive Action | 7 |
| -Recruitment and Selection | 7 |
| -Appraisals | 8 |
| -HIV and AIDS | 8 |
| -Equality and Pay | 8 |
| -Age | 8 |
| -Work/Life balance | 8 |
| -Bullying and Harassment | 9 |
| -Complaints | 9 |
| -Whistleblowing | 9 |
| -Responsibilities | 9 |
| -Monitoring and Evaluation | 10 |
| -Communication | 10 |
| -Review | 11 |



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EQUAL OPPORTUNITIES STATEMENT

Twin Group values the diversity of the United Kingdom (UK) and the other countries it works in.

Due to the numerous services and training courses the work of the Twin Group involves developing relationships with people from a wide range of backgrounds. Engaging positively with the richness of this diversity is central to Twin.

Twin is committed to equality of opportunity and positive action to promote equality of opportunity. It believes that an Equal Opportunities Policy helps to ensure that there is no unjustified discrimination in the recruitment, retention, training and development of staff on the basis of gender, marital status, sexual identity, religious belief, political opinion, race, work pattern, age, disability or HIV/AIDS status, socio-economic background, spent convictions, trade union activity or membership, or on the basis of having or not having dependants. It also believes that an Equal Opportunities Policy benefits employees and potential employees and helps achieve dignity at work and contributes to providing the best possible services to partners and clients.

An Equal Opportunities Guide supports the Policy. It is strongly recommended that the Policy be read in conjunction with the guide.

Twin will progress its Equal Opportunity Policy through its Diversity Strategy.

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EQUAL OPPORTUNITIES POLICY

FOREWORD

We engage with diverse individuals, communities and organisations, agents, teachers and clients around the world and develop and sustain partnerships and relationships based on mutuality. We draw on our Equal Opportunities Policy in order to achieve this.

The Equal Opportunities Policy has the full support of the Board of Directors the Managing Directors and Management Team.

VALUING DIVERSITY

We will progress our Equal Opportunity Policy through our Diversity Strategy. Diversity is an inclusive concept. It takes account of the fact that people differ from one another in many ways: gender, age, race¹/ethnicity, sexual identity, physical ability, mental capacity, religion, education, economic status, personality, communication style and approaches to work, for example. We believe that by understanding, valuing and managing these differences, we are more likely to reflect different contributions, needs and interests resulting in greater participation which benefits Twin.

GENERAL STATEMENTS

- We reject unlawful and unfair discrimination and are committed to implementing policies, strategies and procedures that promote equality of opportunity. We are also committed to removing barriers and attempting to redress imbalances.
- Our selection processes and decisions will not unjustifiably discriminate on the grounds of gender, marital status, sexual identity, religious belief, political opinion, race², work pattern, age, disability or HIV/AIDS status, socio-economic background, spent convictions, trade union activity or membership, or on the basis of having or not having dependants.
- We are committed to promoting equality of opportunity and good relations in accordance with Section 75 of the Northern Ireland Act 1998 through an Equality Scheme and to promoting race equality in accordance with the Race Relations (Amendment) Act 2000 through a Race Equality Scheme.
- We strive to earn the respect and confidence of our clients and customers and to maintain high standards for their benefit.

¹ Throughout this document the word ‘race’ is to be understood to include colour, race, nationality or ethnic or national origins in line with the Race Relations Act 1976 and the Race Relations (Northern Ireland) Order 1997. Irish Travelers are specifically recognised by the Northern Ireland Order as being members of an ethnic group.

² There are jobs identified within the organisation for which UK nationality is a requirement. This is in order to develop and maintain a globally mobile group of senior staff and to meet the expectations of key client groups for whom UK nationality is an important representational factor.





TWIN GROUP VALUES

Our values are integral to our Equal Opportunities Policy. They are:

- *Valuing individuals*

People are at the heart of our work. They matter and we aim to provide opportunities for them to realise their potential. We respect diversity in nationality, culture and beliefs.

- *Internationalism*

We believe in internationalism. Countries are increasingly interdependent and we think that the UK can contribute to, and learn from, the experience of others. We also believe in the power of partnerships in enhancing international understanding.

- *Integrity*

We demonstrate integrity. We meet our commitments and believe that everyone has a right to be treated with fairness, openness, honesty and respect.

LEGISLATION

Our Equal Opportunities Policy is based on legislation and legal standards governing equal opportunities. We aim to abide by and promote this legislation by following the spirit and the letter of it. The relevant Acts and Orders are identified in an indicative appendix (1).

There are three key pieces of legislation within the UK that address discrimination. These are the Sex Discrimination 1975, Race Relations 1976 and Disability Discrimination 1995 Acts.

Other legislation outside the UK addresses discrimination, for example, The Employment Equity Act 1998 South Africa and the European Union Directives on Equal Pay and Equal Treatment of 1975 and 1976.

The Sex Discrimination Act 1975 and Race Relations Act 1976 and The Fair Employment and Treatment Legislation (Northern Ireland) Order 1998 follow very similar definitions of discrimination, whereas discrimination within the Disability Discrimination Act 1995 is framed in a different way.

DISCRIMINATION

Discrimination is a barrier to equal opportunities and unjustified discrimination on all the grounds identified within this Policy, irrespective of whether they are covered by law or not, is unacceptable within Twin.

Relevant legislation aims to address the barrier posed by discrimination and stipulates that it is unlawful to discriminate either directly or indirectly on the grounds of sex, marital status, religious belief, political opinion or race. There must therefore be no discrimination on these grounds in the treatment of people within Twin or in the course of our work, except on the basis of *genuine occupational qualifications* as allowed for and defined within the relevant legislation.

Under the legislation there are two types of discrimination.



Direct discrimination - this occurs when a person treats another person less favourably on the grounds of race, sex or marital status, religious belief or political opinion. This kind of unlawful discrimination can occur even if a person did not openly express an intention or motive to treat someone less favourably.

Indirect discrimination - this occurs when a requirement, condition or criterion is applied equally to everybody but is discriminatory in its effect, as between the genders, or in relation to one particular group of people. This means that the proportion of one particular group or gender that can comply with the requirement, condition or criterion is considerably smaller than another. Furthermore, the requirement, condition or criterion cannot be justified and is to the detriment of the person who cannot comply with it.

Disability Discrimination

The Disability Discrimination Act 1995 makes it unlawful for an employer to discriminate against a person with a disability³ in the field of employment. The Act says discrimination occurs in two ways:

1. For a reason that relates to a person's disability, the employer treats that person less favourably than the employer treats or would treat others to whom the reason does not or would not apply and the employer cannot show that this treatment is justified.
2. An employer fails to comply with the duty of reasonable adjustment in relation to the person with a disability, and the employer cannot show that this failure is justified.

Under the terms of our Equal Opportunities Policy there must be no discrimination on the grounds of disability in recruitment, training, appraisal, dismissal or in the treatment of staff generally within Twin. Changes to the job and adaptations and reasonable adjustments must be made to premises or equipment, if the premises or employment arrangements place people with a disability at a substantial disadvantage

Disablement is not of itself a bar to work within Twin. We are committed to fulfilling our responsibilities to applicants and staff with disabilities and to ensuring that unlawful discrimination on the basis of disability status is avoided.

Discrimination and the Human Rights Act 1998

The Human Rights Act 1998, which incorporates the European Convention on Human Rights 1952 into UK domestic law, refers in Article 14 specifically, to the prohibition of discrimination on grounds such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

³ A person defined as disabled under the Disability Discrimination Act is anyone with a physical or mental (clinically well-recognised mental illness and learning disability) impairment which has a substantial and long-term adverse effect upon his/her ability to carry out normal day-to-day activities.



Discrimination – motives and stereotypes

Discrimination does not only occur as a result of a conscious decision to discriminate on the grounds referred to earlier. There are subtle and unconscious varieties of discrimination that may not be easily perceived. This may result from general assumptions about the capabilities, characteristics and interests of a particular group and from applying requirements, conditions or criteria without considering whether they advantage or disadvantage particular groups. Care must be taken to avoid all forms of discrimination and requirements, conditions or criteria must be shown to be justifiable within the terms of appropriate legislation.

Stereotypes have the potential to lead to discrimination and so should be carefully examined and if necessary challenged. Stereotypical and discriminatory language and terminology should be avoided.

VICTIMISATION

Under relevant UK legislation victimisation is defined as occurring when one person is given less favourable treatment than others in the same circumstances because it is suspected or known that the person has:

- made a complaint under the relevant legislation; or
- given evidence or information relating to any complaint investigation, legal proceedings or appeal under the relevant legislation; or
- done anything else under or by reference to the relevant legislation; or
- alleged a contravention of the relevant legislation.

Less favourable treatment does not amount to victimisation if the person concerned made a complaint that was false and was not made in good faith.

POSITIVE ACTION

Relevant legislation within the UK provides for, among other things, positive action measures. This holds where members of a particular gender, racial or religious group has been underrepresented over the previous 12 months in particular work. In these instances, employers may encourage them to take advantage of any opportunities for doing that work, or provide training and development to help them develop the skills needed for it.

We are aware of these provisions and will take them into account in arranging training courses and development opportunities and in providing guidance and equal opportunity training. We welcome applications for jobs and training from an under-represented community, minority or gender and identify positive action measures to support the targets we have set to try to address under representation.

RECRUITMENT AND SELECTION

Advertisements, whether internal or external (this includes all media, leaflets, posters and other aids, visual or non visual) must not indicate or appear to indicate an intention to unjustifiably discriminate on grounds previously identified within this policy.



All advertisements should reflect our commitment to equal opportunities through the following statement:

“Twin Group is committed to a Policy of Equal Opportunities” and “We guarantee an interview to candidates with disabilities who meet the essential criteria.”

Advertising should not be confined unjustifiably to those areas or publications which would exclude or disproportionately reduce the number of applicants of a particular minority, community, gender, marital status, sexual identity, religious belief, political opinion, colour, race, nationality, ethnic or national origin.

APPRAISALS

The Equal Opportunities Policy applies to the appraisal process. When reporting on staff, managers should base their assessments solely on an individual's capabilities, performance or evidence of potential. Reports should not reflect any assumptions about staff (e.g. women's mobility or length of future service).

HIV and AIDS

Given the climate of fear that has developed around HIV and AIDS and its global prevalence, the British Council recognises the unique nature of this illness.

We are committed to maintaining a safe environment free from harassment or other forms of discrimination based on HIV infection or AIDS, as far as is within our control. It is acknowledged that AIDS is a condition covered by the Disability Discrimination Act 1995 and that HIV may be.

EQUALITY AND PAY

Equal pay between men and women, free of gender bias, is a fundamental principle of European Community law and is supported by UK legislation.

Given the principle of equal opportunity in employment, we believe that male and female staff should receive equal pay for the same or broadly similar work, for work that rates as equivalent and for work of equal value. A pay system that is transparent based on objective criteria and free from gender or other unjustified bias will continue to operate within Twin.

AGE

We believe that it is positive to have a workforce of employees of different ages and we require staff to ensure that there is no unjustified age discrimination.

We commit ourselves to the Government initiative 'Age Positive'. This challenges age discrimination in the workplace and demonstrates the human resource and general business benefits of being an Age Positive employer. We stand by the Age Diversity in Employment Code of Practice covering six aspects



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of the employment cycle: recruitment, selection, promotion, training, redundancy and retirement and setting principles for tackling age discrimination and promoting age diversity in the workplace.

WORK/LIFE BALANCE - COMBINING WORK AND DOMESTIC RESPONSIBILITIES AND CHOICES

It is in our interests to retain trained staff. Consistent with the justifiable needs of the work, efforts will therefore be made to enable members of staff to reconcile work with domestic responsibilities and choices. In order to achieve this, Twin provides initiatives to support work/life balance through, for example: adoptive, maternity and paternity leave, flexible working hours, part-time working, sabbatical opportunities, home working, career breaks, special leave, carer leave, assistance with childcare and parental leave.

Where employees have particular cultural and religious needs which may conflict with existing work requirements, careful consideration will be given to whether it is reasonably practical to vary or adapt these requirements to enable these needs to be met.

Where employees request either the accumulation of annual leave or unpaid leave in order to visit relatives overseas, sympathetic consideration will be given. Sympathetic consideration will also be given to requests for unpaid leave or the exchange of public holidays for other Holy Days of Obligation for example Eid, Rosh Hashanah, Ramadam, Yom Kippur, Diwali and Guru Nanak. Leave should not be refused without strong justification.

BULLYING AND HARASSMENT

Bullying and harassment play no part in our working culture or practices and our Equal Opportunities Policy requires each member of staff to guard against all harassment.

Bullying and harassment can manifest themselves in a variety of ways, including by one member of staff to another of a different or equivalent level/pay band, or by one group of staff to another individual member of staff. If bullying or harassment involves issues of gender, sexual identity, marital status, carer responsibility, race, religious belief, political belief, colour, nationality, ethnic or national origins, age or disability, equal opportunities legislation may apply.

COMPLAINTS

Any member of staff who feels that they have not been treated in accordance with our Equal Opportunities Policy has a right to register a complaint under the Grievance Framework.

Staff must not be intimidated, discriminated against or treated differently for raising a concern, complaining or assisting in an investigation. If this happens it could amount to victimisation.

WHISTLEBLOWING

The Whistleblowing Policy aims to protect Twin by providing a framework that encourages and enables staff to raise concerns about serious malpractice. These concerns may be about financial malpractice, breaches of the law, serious misconduct by another person and breaches of policies in health and

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safety, or equal opportunities. Built into the policy is an assurance that there will be no risk to the person's position if actions are based on good faith.

RESPONSIBILITIES

As an organisation representing and promoting the UK overseas, it is particularly important that we reflect contemporary UK society and good workplace management practice. Further, it is important that we adhere to legislation and behaviours addressed within this Policy and the supporting guidance.

We must be mindful of these obligations and note that as a general principle of law, employers are liable for acts of discrimination committed by their employees in the course of their employment.

Putting the Policy into practice is the responsibility of every individual employee. All staff, whether on full-time, part-time, casual or temporary contracts, regardless of length of service are responsible for playing their full part in adhering to the Policy. This means becoming familiar with its terms, carrying them out and critically examining attitudes to ensure that discrimination is not allowed to affect judgement. The law and the existence of an Equal Opportunities Policy cannot by themselves prevent discrimination.

All staff will be supported to be aware of the forms which discrimination can take, to guard against them and to avoid any action that might influence others to discriminate unfairly. This will be achieved through ongoing awareness and training initiatives.

Responsibility for ensuring the implementation of the Policy and for dealing with matters arising from it lies with managers within departments. As part of fulfilling this responsibility, managers must take care to deal effectively with complaints of discrimination, harassment, bullying and victimisation. They must not make assumptions that complaints are a result of over-sensitivity and must take them seriously and deal with them sympathetically.

If a member of staff discriminates against another person or fails to co-operate with the measures that are designed to promote equal opportunities, or induces others to do so, they will be subject to disciplinary action.

Twin opposes any conduct or activity by any individuals it employs which is contrary to its Equal Opportunities Policy or which is likely to bring it into disrepute in relation to equal opportunity issues.

Nothing in the Equal Opportunity Policy is intended to interfere with the legitimate freedom of artistic or intellectual expression, investigation or discussion. It is understood that there can often be a fine line between what is acceptable and unacceptable and each case will be considered on its merit.

MONITORING AND EVALUATION

Monitoring and evaluation assists us in establishing the effectiveness of our Equal Opportunities Policy and Diversity Strategy.

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We currently monitor the main HR functions by gender, ethnic origin, religion (in NI) and disability. Staff are asked to provide personal information in support of this. Information is treated in the strictest confidence, does not breach the Data Protection Act 1998 and is only used for the purposes of monitoring the effectiveness of the Policy.

COMMUNICATION

A copy of the Equal Opportunity Statement, the Policy and supporting explanatory guide will be made accessible to all employees.

Twin Directors will ensure that all those who have influence over employment opportunity within Twin are aware of the Policy.

All staff, including new employees will be made aware of the Policy and the responsibilities of both Twin and the individual in achieving equal opportunity objectives. In addition, the Policy and the Diversity Strategy that results from it will feature whenever appropriate in relevant training courses, guidance notes and manuals.

Relevant departments within Twin must ensure that contractors are aware of the Policy and their obligations to work within its parameters. Departments will need to have sight of the Equal Opportunity Policy of contractors before entering into a contract with them.

REVIEW

We commit ourselves to undertaking a formal review of the Policy at least once every two years and to communicate changes to employees. Responsibility for this lies with a designated Equal Opportunity Officer.

Equal Opportunities Officer

Jan, 2006

Board and Senior Management signatories to the Policy:

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Jacqui Fox
Managing Director