

- 1 Luce Bay Group are committed to being a community in which equality of opportunity is a reality for all staff and students. Our mission and values require us to create a positive environment in which all staff and students, present and prospective, are respected, are provided with development and progression opportunities, and can make the most of their abilities. Every employee has a responsibility for implementing this policy in all of their activities.
- 2 No member of Luce Bay Group's workforce will receive unfair or unlawful treatment due to race, colour, nationality, ethnic or national origins, gender, creed, marital status, sexual orientation or disability, gender re-assignment, nor face unwarranted discrimination on the grounds of age. The company will identify and root out any unfair or unlawful discrimination which denies individuals opportunities on any of these grounds.
- 3 Discrimination resulting in unequal opportunities is not acceptable.
- 4 Direct discrimination consists of treating another person less favourably than others on the grounds of: race, colour, creed, nationality, disability, sexual orientation, gender and/or marital status (or other personal characteristics).
- 5 Indirect discrimination occurs when a non-essential condition or requirement is applied equally to all, but only a small proportion of one group can comply with this and failure to comply is detrimental to the individual.  
Harassment is any conduct related to age, disability, nationality, gender, or any other personal characteristic, which is perceived as detrimental and which is unwanted by the recipient, or any such conduct based on the above characteristics which affects the dignity of any individual or group of individuals at work. Harassment may be persistent or an isolated incident, and may be directed towards one or more individuals. It encompasses:
  - unwanted physical contact, assault or propositions;
  - suggestive remarks or gestures, graffiti, offensive comments, jokes and banter based on race, religion, gender or other personal characteristics;
  - behaviour which causes the victim to feel intimidated, humiliated, patronised or harassed, such as bullying, persistent teasing, or constant unfounded criticism of the performance of work tasks, unfair allocation of work and responsibilities or exclusion from normal work place conversation or social events.

Luce Bay Group believe that such behaviour undermines the well-being of the person concerned and may also adversely affect his or her work performance. No such conduct is a part of a culture in which all employees are treated with dignity and respect.

Any complaint of harassment will be treated seriously and with confidentiality. Failure on the part of any employee to do so will be regarded as a failure to fulfil the responsibilities of their position. All steps will be taken to maintain confidentiality as far as is consistent with progressing the complaint. Making a false allegation with malicious intent may result in the appropriate disciplinary procedure. If an employee brings a false complaint then it will be dealt with using the disciplinary procedure.

6 Luce Bay Group aim to facilitate access to assessment by having in place clear arrangements for making reasonable adjustments in relation to our qualifications and awards. These will reflect the needs of individual learners and ensure the assessment remains valid, reliable and consistent where adjustments are approved.

7 Luce Bay Group will:

- break down any barriers to equality of opportunity, which may prevent an employee realising their full potential;
- promptly and fully investigate all complaints of discrimination and harassment, taking appropriate action where necessary;
- ensure that all employees are fully informed of this policy and that outside agencies employed are also informed of it

8 Policy Monitoring

This policy is maintained by the Directors of Luce Bay Group and will be reviewed annually. Luce Bay Group are committed to implementing our policies.



Adam McIntosh  
Company Director  
01 December 2022



Alastair McIntosh  
Company Director  
01 December 2022