

Equality and Diversity Policy

1 Commitment

The firm is committed to eliminating unlawful discrimination and to promoting equality and diversity within our policies, practices and procedures. This applies to the firm's professional dealings with clients, staff and Partners, other solicitors, barristers, and third parties. The firm will treat everyone equally and with the same attention, courtesy and respect, regardless of:

- Sex (including marital status, gender (including transgender), pregnancy, maternity and paternity);
- Sexual orientation (including civil partnership status);
- Race or racial group (including colour, nationality and ethnic or national origins);
- Religion or belief;
- Age;
- Caring responsibility; or
- Disability.

In implementing its Equality and Diversity Policy, the firm will comply with the SRA Code of Conduct, the Equality Act 2010 and with any other relevant legislation in force from time to time relating to discrimination in employment and the provision of goods, facilities or services. The SRA Code of Conduct requires firms to achieve the following outcomes:

- You do not discriminate unlawfully, or victimise or harass anyone, in the course of your professional dealings;
- You provide services to clients in a way that respects diversity;
- You make reasonable adjustments to ensure that disabled clients, employees or managers are not placed at a substantial disadvantage compared to those who are not disabled, and you do not pass on the costs of these adjustments to these disabled clients, employees or managers;
- Your approach to recruitment and employment encourages equality of opportunity and respect for diversity;
- Complaints of discrimination are dealt with promptly, fairly, openly, and effectively.

2 Meeting Clients' Needs

The firm will treat all clients equally and fairly and not unlawfully discriminate against them. The firm will also, wherever possible, take steps to promote equal opportunity in relation to access to the legal services that it provides, taking account of the diversity of the communities that it serves. The firm is committed to meeting the diverse needs of clients and will take steps to identify the needs of clients in the community and ensure the services provided are accessible to all. The firm will take into account, in particular, the needs of clients with a disability and clients who are unable to communicate effectively in English. The firm will consider whether particular groups are predominant within its client base and devise appropriate policies to meet their needs: including men and women; carers; children; the elderly; members of religious groups; ethnic groups or nationalities; and lesbian, gay or transgender people.

3 Dealings with third parties

The firm will not unlawfully discriminate in dealings with third parties. This applies to dealings with other legal service providers and general procurement. In all its professional dealings, the firm will instruct barristers and experts on the basis of their skill, experience and ability and not unlawfully discriminate, or encourage barristers' clerks to unlawfully discriminate on the grounds of their age; gender; marital status; race; religion or belief; sexual orientation or on the grounds of disability.

4 Employment

General Statement

As an employer, the firm will treat all employees and job applicants equally and fairly and not unlawfully discriminate against them. This applies equally to voluntary positions and anyone undertaking work experience with us. This will, for example, include arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, work allocation and any other employment related activities.

Recruitment and Selection

The firm recognises the benefits of having a diverse workforce and will take steps to ensure that:

- We endeavour to recruit from the widest pool of qualified candidates practicable and will consider the use of job centres, careers services and press advertisements in order to achieve the same;
- Employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- Where appropriate, positive action measures are taken to attract applications from all sections of society and especially from those groups which are underrepresented in the workforce;
- Selection criteria and processes do not unlawfully discriminate on the grounds of sex (including marital status, gender (including transgender), pregnancy, maternity and paternity), sexual orientation (including civil partnership status), religion or belief, age or disability; other than in those instances where the firm is exercising permitted positive action or a permitted exemption;
- Wherever appropriate and necessary, lawful exemptions (genuine occupational requirements) will be used to recruit suitable staff to meet the special needs of particular groups;
- Any recruitment agencies acting for the firm will be made aware of requirements not to discriminate and to act accordingly.

Conditions of service

The firm will treat all employees equally and create a working environment which is free from unlawful discrimination and which respects the diverse backgrounds and beliefs of employees. Terms and conditions of service for employees will comply with anti-discrimination legislation. The provision of benefits such as flexible working hours, maternity and other leave arrangements, performance appraisal systems, dress code, bonus schemes and any other conditions of employment will not unlawfully discriminate against any employee on the grounds of their age; gender; marital status; race; religion or belief; sexual orientation or on the grounds of disability.

Where appropriate and necessary, the firm will endeavour to provide appropriate facilities and conditions of service which take into account the specific needs of employees which arise from their ethnic or cultural background; gender; responsibilities as carers; disability; religion or belief or sexual orientation.

Promotion and Career Development

Promotion within the firm including to Partner level will be made without reference to any of the forbidden grounds and will be based solely on merit. The selection criteria and processes for recruitment and promotion will be kept under review to ensure that there is no unjustifiably discriminatory impact on any particular group.

While positive action measures may be taken in accordance with relevant anti-discrimination legislation to encourage applications from under-represented groups, appointments to all jobs will be based solely on merit. All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. However, the firm will take appropriate positive action measures (as permitted by the anti-discrimination legislation) to provide special training and support for groups which are under-represented in the workforce and encourage them to take up training and career development opportunities.

Reasonable Adjustments

In accordance with the Disability Discrimination Act, the firm will ensure that reasonable adjustments to the workplace and to work arrangements are considered in order that people with disabilities are not disadvantaged. Such adjustments will also be considered for those who become disabled during employment. For example considerations may relate to modification of an employee's existing job or, if not reasonably practicable, modifications in an alternative job, where such an opportunity is suitable and available.

Staff with specific requirements should make requests for reasonable adjustment decisions to a Partner. All requests for reasonable adjustments will be considered on a case-by-case basis and where it is not possible to make the adjustment requested, the firm will discuss viable alternatives with the applicant. In no circumstances will the firm pass on the cost of a reasonable adjustment to a disabled person.

Working with other organisations

All those who act on the firm's behalf will be informed of this equality and diversity policy and will be expected to pay due regard to it when conducting business on the firm's behalf. In all its dealings, including those with Partners, any consortium members, suppliers, sub-contractors and recruitment agencies, the firm will seek to promote the principles of equality and diversity.

5 Responsibilities

The ultimate responsibility for implementing the policy rests with the firm. The firm will appoint a senior person within it to be responsible for the operation of the policy which will be evidenced within the QPM. All employees and Partners of the firm are expected to pay due regard to the provisions of this policy and are responsible for ensuring compliance with it when undertaking their jobs or representing the firm.

6 Breaches of the Policy

The firm will treat seriously all complaints of unlawful discrimination on any of the forbidden grounds made by Partners, employees, clients, barristers or other third parties and will take action where appropriate. The firm's grievance procedure is available to any employee who believes that he or she may have been unfairly discriminated against or subject to harassment.

Employees will not be victimised in any way for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and as soon as reasonably possible. The Partners will provide, in confidence, advice and assistance to

employees subjected to alleged breaches of this Policy and assist in the resolution of any problems, whether through informal or formal means.

Complaints of unlawful discrimination against the firm by clients and other parties will follow the firm's complaints procedure set out elsewhere in the QPM. Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment may be treated as gross misconduct. Further, employees should be aware that they could be personally liable for damages in circumstances where a court or tribunal finds them to have harassed a fellow employee or client.

If the allegation is not well founded, consideration will be given to whether it is necessary to transfer or reschedule the work of both or either party in cases where the Firm considers it would not be reasonable for either of you to continue to work in close proximity to each other. Allegations of discrimination that are not made in good faith will be considered as a disciplinary matter. Malicious complaints of harassment can have a serious and detrimental effect upon a colleague and the efficiency of the business. As such an allegation made in bad faith will be deemed potential gross misconduct. We are sure that all employees appreciate that this must be so to protect the integrity of this policy.

The firm will also monitor the number and outcome of complaints of discrimination made by staff, clients, Partners, barristers, and other third parties.

7 Monitoring

The policy will be monitored to and also reviewed at least annually to measure its progress and judge its effectiveness. In particular, the firm will, as appropriate, monitor and record:

- a) The age, race, gender, disability, religion or belief, sexual orientation and disability composition of the workforce and Partners as well as at different levels of the organisation.
- b) The age, race, gender, disability, religion or belief, sexual orientation and disability of all applicants, short-listed applicants and successful applicants for jobs and training contracts.
- c) The age, race, gender, disability, religion or belief, sexual orientation and disability of all applicants for promotion (including to Partnership, to the role of a Member of a Limited Liability Partnership or Director of a Company) and training opportunities and details of whether they were successful.
- d) Where it is possible to do so, and where doing so will not cause offence or discomfort to those whom it is intended to protect, the age, race, gender, disability, religion or belief, sexual orientation and disability of Partners and staff will be monitored so as to ensure that they are not being discriminated against in terms of the opportunities or benefits available to them. Firms should, however, be aware that Partners and staff may not choose to disclose their sexual orientation or religion or belief and that care should be taken to avoid inadvertent discrimination in such cases.
- e) The number and outcome of complaints of discrimination made by staff, Partners, barristers, clients and other third parties.
- f) Disciplinary action (if any) taken against employees by age, race, gender, disability, religion or belief, sexual orientation and disability.
- g) Situations where permitted exceptions and justifiable discrimination has been applied.

The firm will monitor annually equal opportunities information about job applicants from different gender, disability and ethnic groups. The firm will store this data as confidential personal data and restrict access to this information. Equal opportunities information will be used for exclusively the purposes of equal opportunities monitoring and have no bearing on

opportunities or benefits. If as a result of these reviews, under-representation in the above groups is identified then the firm will consider the taking of positive action such as consideration of specific training requirements and /or the amendment of this policy.

8 Training

It is a requirement of Lexcel and the SRA Code that all personnel are given training on compliance with equality and diversity requirements. The firm will identify equality and diversity training needs for all Partners and staff and draw up a plan to address these as appropriate to individual responsibilities. The plan will include details of the nature of training that will be provided, who will be trained, when training will be provided and who is responsible in the firm for ensuring that training is delivered. Equality and diversity training needs will be monitored at annual appraisals and any needs will be identified on the individual's Learning and Development Plan.