



AMBASSADOR

Education Group

Equal Opportunity and Non-Discrimination Policy and Procedure

EHS Department 2023/2024

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3. SCOPE

This *Equal Opportunity and Non-discrimination Policy and Procedure* applies equally to all employees (part-time, full-time or temporary), and employees' dealings with parents, contractors, suppliers and any other third parties.

4. DEFINITIONS

What is discrimination?

Discrimination occurs when a person, or a group of people, with an 'attribute' is treated less favourably than another person, or group of people, without the attribute is or would be treated in the same or similar circumstances.

For example: *Two employees perform the same job and have similar qualifications and experience. One is a male with no family responsibilities. The other is a female with family responsibilities. A development opportunity arises and is given to the male on the basis that, as a male with no family responsibilities, he is presumed to be more reliable and will be able to work longer hours.*

Other examples of treating someone less favourably on the basis of an attribute they possess or by an act involving a distinction, exclusion or preference, include:

- judging someone on their political or religious beliefs rather than their work performance;
- using stereotypes or assumptions to guide decision-making about a person's career;
- undermining a person's authority because of their race, gender or sexual preference;
- making offensive jokes or comments about another worker's racial or ethnic background, gender, sexual preference, age, disability or physical appearance; or
- denying further training to employees on the basis of impairment.

Indirect discrimination occurs when a requirement is imposed:

- with which a person with the attribute does not or is not able to comply;
- with which a higher proportion of people without the attribute comply or are able to comply; and
- that is not reasonable.

Third-party discrimination occurs where a Company employee is treated less favourably on the basis of an attribute they possess or by an act involving a distinction, exclusion or preference, harassed, by third parties such as parents or other. AEG will not tolerate such actions against its employees, and the employee should raise their concerns in accordance with the grievance mechanisms set out in that Policy.

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5. ROLES AND RESPONSIBILITIES

Role	Responsibility
Chief Executive Officer	Ensuring the effective implementation and operation of the arrangements of this Policy.
Directors/ Managers	<p>Ensure that they and their reports operate within this Policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination.</p> <p>Each Director/ Manager will ensure that:</p> <ul style="list-style-type: none"> all their staff are aware of the Policy and the arrangements, and the reasons for the Policy; grievances concerning discrimination are dealt with properly, fairly and as quickly as possible; and proper records are maintained.
Human Resources	<ul style="list-style-type: none"> Providing advice, support and guidance to all employees on this Policy and protocol Monitoring the operation of the Policy in respect of employees and job applicants, including periodic departmental audits.
Employees	<ul style="list-style-type: none"> Complying with this Policy and arrangements. Ensure they do not victimise, harass or intimidate other employees or groups who have, or are perceived to have one of the 'attributes'. Co-operating with this Policy and identifying suspected breaches through the grievance procedures.

6. PROCEDURES

6.1 General Statement

AEG schools require that all employees are afforded equal opportunity and fair treatment, and will not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices. The primary consideration will be the relevant merits and abilities of the individual.

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6.2 Recruitment and Selection

AEG schools recognise the benefits of having a diverse workforce and will take steps to ensure that all candidates for employment are treated fairly, and that selection is based solely on the individual's abilities and qualifications. The recruitment process must result in the selection of the most suitable person for the job having regard to experience and qualifications where necessary.

The School will adhere to the following procedure for recruiting and selecting individuals for all positions:

Selection Criteria

Selection criteria for all jobs will be clearly defined and reflected in the job description sent to applicants, which will also include details of the AEG's commitment to equality of opportunity. The job qualifications or requirements which would have the effect of inhibiting applications from members of particular groups, such as those of one sex, persons of a particular religion, marital status or sexual orientation, persons of a particular racial group, persons within a certain age bracket or those with a disability, will not be demanded or imposed except where they are justifiable in terms of the job to be done. Where appropriate, positive action measures may be taken to attract applications from all sections of society and especially from those groups which are underrepresented in the workforce.

Advertising Available Jobs

Job advertisements will be widely publicised to encourage applications from all suitably qualified candidates. AEG schools will ensure that advertisements are not restricted to area or publication that may exclude or disproportionately reduce applications from a particular gender, religion, age group or racial group.

All job advertisements placed on behalf of the AEG schools will state AEG's commitment to equality of opportunity. No job advertisements can prescribe requirements as to age, gender or other, unless positive action is being undertaken to attract applications from all sections of society and especially from those groups which are underrepresented in the workforce. Or, where there are lawful exemptions, based on genuine occupational health and safety requirements.

Where recruitment agencies act on behalf of AEG, they must be aware of the requirement not to discriminate and to act accordingly.

Selection Methods

All those involved in handling applications and conducting interviews must be aware of this Policy and existing legislation which cover equal employment opportunities and anti-discrimination. The selection of new employees will be based on job requirements and the individual's qualities and

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When considering employees for promotion, this is solely based on merit. No employee will be discriminated against on the grounds of their gender, race, disability, ethnic, social and cultural origin, nationality, religion or belief, age or sexual orientation.

Where positive action measures have been undertaken to encourage underrepresented groups to apply for jobs, and if they were employed, the assessment and promotion of these employees within the school 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 school will take appropriate positive action measures (as per this Policy and relevant anti-discrimination legislation) to provide special training and support for groups which are underrepresented in the workforce and encourage them to take up training and career development opportunities.

6.5. Grievances and Disciplinary Action

6.5.1 Grievances

All allegations of discrimination on the grounds of gender, race, disability, ethnic, social and cultural origin, nationality, religion or belief, age or sexual orientation will be dealt with seriously and confidentially.

Any employee may use the AEG's Internal Grievance Procedure to report on discriminatory conduct. No employees, who raise such a grievance, will be penalised for reporting such a grievance, unless it is false and made in bad faith. Parents, contractors, suppliers or any other third parties that feel they have been discriminated against by a school employee, can report the complaint through the AEG External Grievance Policy and Procedure.

All complaints will be investigated in accordance with the AEG's Grievance Procedures, and the individual that submitted the complaint will be informed of the outcome.

Reporting Grievances Externally

If you believe that you have been the subject of unlawful discrimination, you may also lodge a complaint with one of the organisations as detailed in AEG's Grievance Policies and Procedures.

If laws and regulation exist with regard to discrimination in the country(ies) of operation, there may be Government agencies where complaints may (also) be reported or mandatory to report. This information should be provided to employees.

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6.5.2 Disciplinary Action

Where it has been determined that an employee has breached this Policy, disciplinary action will be taken, ranging from verbal or written warnings to dismissal, as per AEG's policies. Breaches may also be considered a criminal offence.

Disciplinary action will also be taken against individuals that victimise or retaliate against employees who make allegations about discrimination. Disciplinary action will range from verbal or written warnings to dismissal, as per AEG's policies. Breaches may also be considered a criminal offence.

7. TRAINING AND COMMUNICATION

To meet the objectives of this Policy, AEG will provide training and communicate as follows:

- Conduct training to all employees to:
 - o increase awareness of the prevalence of and harmfulness of discrimination and prejudice on the grounds of gender, race, disability, ethnic, social and cultural origin, nationality, religion or belief, age or sexual orientation, and the needs and abilities of people with disabilities or other disadvantages and examine the nature of discrimination, both direct and indirect, and the ways in which it can occur and can be prevented;
 - o assist managers and employees to behave in ways that are non-discriminatory;
 - o explain the Grievance Policies and Procedures, including the channels to report grievances or complaints, and Disciplinary Policy and Procedure; and
 - o explain how to use the 'Speak Up' whistleblowing program.

For new employees, training on the *AEG Equal Opportunity and Non-Discrimination Policy and Procedure* will be completed during the induction. For existing employees, refresher training will be provided as and when required. Training must be in the languages that all employees understand. Appropriately trained translators may need to be engaged.

- Communicate the key points of the Policy and Procedure in the Employee Handbook and Employee Contracts.
- Communicate the prevalence of and harmfulness of discrimination and prejudice on the grounds of gender, race, disability, ethnic, social and cultural origin, nationality, religion or belief, age or sexual orientation, and the needs and abilities of people with disabilities or other disadvantages, and what and how to reports incidents through the use of leaflets, notices or other, posted throughout the offices, canteens, playgrounds, parking lots, warehouses or other areas where visible to majority of employees. Town Hall or other meetings should also

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include mentions and reminders on the AEG Equal Opportunity and Non-Discrimination Policy and Procedure.

8. MONITORING RECORDS

The school will monitor and record:

- training (which employees, total hours and frequency) of this Policy;
- the gender and composition of the workforce (age, nationality and status, ie foreign or local employee), as well as the number of disabled employees, at different levels of the organisation;
- the gender, age, disability and status (foreign or local employee) of all applicants for promotion and training opportunities and details of whether they were successful;
- where possible, and where it will not cause offence or discomfort to those whom this Policy is intended to protect, the sexual orientation and religion or belief of all employees will be monitored. This is to ensure that they are not being discriminated against in terms of the opportunities or benefits available to them. It is not mandatory to provide this information, and no employee that chooses not to disclose this information should be discriminated against; and
- the number of complaints of discrimination made by employees, clients/customers, suppliers or other third parties and the number of complaints of discrimination made by employees, clients/customers, suppliers or other third parties that resulted in disciplinary action.

9. POLICY REVIEW

The information collected (Monitoring Records) will be used to review and assess the effectiveness of this Policy. The review of this Policy will be conducted on a regular basis, and in any event at least annually. Any changes made will be communicated to all employees.

10. DOCUMENT CHANGE CONTROL

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