



[www.clearfocusproductions.ltd.uk](http://www.clearfocusproductions.ltd.uk)

## **Equality, diversity and inclusion (EDI) policy**

Clear Focus Productions Ltd is committed to creating a workplace where equality, diversity, and inclusion (EDI) are integral to our operations. We celebrate the diverse team of freelancers we have built up over the years. We value and promote an inclusive environment where everyone is treated fairly, with dignity and respect. We aim to ensure that everyone we work with feels valued, respected, and supported while working for us, regardless of their background or personal characteristics.

Clear Focus is a small video and online course production company with two employees, both directors. We also work with self-employed freelancers such as camera crews, designers and editors, contracted to perform specific pieces of work on a project basis. We believe the diversity of the pool of freelancers we draw on enriches our creative output and reflects our diverse audiences. We understand that these self-employed colleagues are covered by the Equality Act 2010. We are committed to a policy of treating all contractors equally, as well as providing reasonable adjustments to provide equality of opportunity to disabled employees. Clear Focus will avoid unlawful discrimination in all aspects of employment including selection, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

It is the policy of the business to take all reasonable steps to employ and promote employees on the basis of their abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex and/or sexual orientation. In this policy, these are known as the 'protected characteristics'.

## **Scope**

This policy applies to all conduct in the workplace, including conduct at meetings, when filming on location, and in social interactions. This policy also applies to conduct outside work which may impact on the business's reputation, including employees' expression of views on social media which are contrary to the commitments expressed in this policy, that could be linked to the business.

### **Employees' duties**

The freelancers we employ have a duty to co-operate with Clear Focus directors, to ensure that this policy is effective in ensuring equality, diversity and inclusion and preventing discrimination and harassment. Serious breaches of this equality, diversity and inclusion policy will be treated as potential gross misconduct and could render the freelancer liable to summary dismissal. They should also bear in mind that they can be held personally liable for any act of unlawful discrimination.

Freelancers must not harass, bully or intimidate other workers for reasons related to one or more of the protected characteristics (listed above). Such behaviour will be treated as potential gross misconduct. Any who commit serious acts of harassment may also be guilty of a criminal offence.

Freelancers should draw the attention of their producer to suspected discriminatory acts. Other employees or freelancers must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or who has provided information about such discrimination. Employees and freelancers should support colleagues who suffer such treatment and are making a complaint.

### **Company directors' duties**

Company directors at Clear Focus must ensure they adhere to this policy and promote the aims and objectives set out here with regard to equality, diversity and inclusion. They are also responsible for identifying and addressing any behaviours or processes that conflict with this policy. Company directors should refresh their awareness of equality, diversity and inclusion from time to time, for instance by using resources provided by the Federation of Small Businesses, of which we are members.

## **Direct discrimination**

Direct discrimination occurs when, because of one of protected characteristics, a job applicant, freelancer or employee is treated less favourably than other job applicants, freelancers or employees are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated, and not on the job applicant's, employee's or freelancer's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or freelancer has a particular protected characteristic when in fact, they do not. Discrimination is also unlawful if it arises out of, and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

Clear Focus will take all reasonable steps to eliminate direct discrimination in our business.

## **Indirect discrimination**

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants, freelancers or employees, but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is applied to a job applicant, freelancer or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic. A PCP is discriminatory in relation to a protected characteristic of the job applicant's, freelancer's or employee's if:

- It is applied, or would be applied, to persons with whom the job applicant or freelancer does not share the protected characteristic,
- The PCP puts, or would put, persons with whom the job applicant or freelancer shares the protected characteristic at a disadvantage when compared with persons with whom the job applicant or employee does not share it,
- It puts, or would put, the job applicant or freelancer at that disadvantage, and
- It cannot be shown by the business to be a proportionate means of achieving a legitimate aim.

Clear Focus will take all reasonable steps to eliminate indirect discrimination in our business.

### **Reasonable adjustments**

Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful.

Examples of reasonable adjustments might include:

- allocating some of the disabled person's duties to a colleague;
- changing their working hours or place of work;
- adjusting procedures for assessing job candidates; and
- modifying disciplinary and grievance procedures.

Clear Focus will put in place reasonable adjustments for disabled employees and recruits in compliance with its statutory duty, where the business is aware the employee, freelancer or applicant is disabled.

### **Harassment and sexual harassment**

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Clear Focus will take all reasonable steps to eliminate harassment based on a protected characteristic and sexual harassment within its business operations.

### **Victimisation**

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or promotion because they have raised or supported a grievance or complaint of unlawful discrimination, or because they have issued employment tribunal proceedings for unlawful discrimination or they have given evidence in connection with unlawful discrimination proceedings brought by another employee. However, an employee is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith. Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.

Clear Focus will take all reasonable steps to eliminate victimisation within its business operations.

### **Recruitment**

Clear Focus' ability to recruit staff or freelancers is dependent on the nature and number of commissions we receive. We are a micro-company, and the small scale of our operation currently means that recruitment is restricted to hiring freelancers for specific, short-term projects. Within these constraints, recruitment will be conducted in such a way as to result in the selection of the most suitable person for the job in respect of abilities and qualifications. If, in future, we should experience a significant change in the scale of our operations, we will review this policy and use the fair recruitment procedures published by the Federation of Small Businesses.

### **Terms of employment, benefits and facilities**

All terms of employment, benefits, and facilities offered to staff and freelancers will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

## **Equal pay and equality of terms**

Clear Focus is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out 'like work': work rated as equivalent or work of equal value. In order to achieve this, the business will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

## **Grievances and complaints**

All allegations of discrimination will be dealt with seriously, confidentially and speedily. Clear Focus will not ignore or treat lightly grievances or complaints about unlawful discrimination from employees or freelancers. Employees and freelancers will not be penalised for raising a grievance, even if it is not upheld, unless the complaint was both untrue and made in bad faith.

## **Monitoring equality, diversity and inclusion**

Clear Focus will regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equality, diversity and inclusion in the workplace is being achieved. This will also involve considering any possible indirectly discriminatory effects of its standard working practices. If changes are required, Clear Focus will implement them. We will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

Provision of information by freelancers, employees or job applicants regarding a protected characteristic is voluntary. It will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information regarding protected characteristics, including in EDI monitoring forms, will be stored confidentially and (in the case of recruitment) kept separate from applications before shortlisting. This information will be used solely by the business for the purpose of equality, diversity and inclusion monitoring. Reviewing this data helps the business to take appropriate steps to avoid discrimination and improve equality and diversity.

Developed by: Gail Block

Issue date: 21 May 2026

Review date: 21 May 2028

A handwritten signature in black ink, appearing to be 'Gauron', with a long horizontal flourish extending to the right.

Signed by: Sarah Gail Frances Gauron (aka: Gail Block)

Title: Managing Director / Senior Producer