

Equal opportunities policy template

An equal opportunities policy is not a legal requirement in the UK, but the law it describes is. The Equality Act 2010 protects nine characteristics and makes an employer liable for discrimination by its employees unless it took all reasonable steps to prevent it. The nine are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Acas describes a policy covering equality, diversity and inclusion as a good start. The template below sets out the commitment, what is unlawful, who is responsible and how to raise a concern.

Download the policy ? PDF • edit the [bracketed] parts

What does an equal opportunities policy say? The template

Replace each [bracketed placeholder]. Keep the definitions close to the Act's own words; a policy that paraphrases them loosely creates arguments later.

1. Our commitment

[Company name] is committed to equal opportunity for everyone who works for us or applies to work for us. We will not discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. Decisions about recruitment, pay, training, promotion, discipline and dismissal will be made on merit and against criteria that relate to the job.

2. Who this covers

This policy applies to all employees, workers, agency staff, contractors, volunteers and job applicants, at every stage from advertising a role to references after someone leaves. It applies in the workplace, at work events, on work trips and in work-related messages and social media. It does not form part of your contract and we may amend it.

3. What is unlawful

Direct discrimination: treating someone less favourably because of a protected characteristic. Indirect discrimination: applying a rule or practice to everyone that puts people who share a protected characteristic at a disadvantage and cannot be justified. Harassment: unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Victimisation: treating someone badly because they complained of discrimination or supported someone who did. Discrimination arising from disability: treating someone unfavourably because of something connected with their disability, without justification. Failure to make reasonable adjustments for a disabled person.

4. Recruitment and selection

Vacancies are advertised [internally and externally] with a job description and criteria that relate to the role. Shortlisting and interviews are scored against those criteria by [two] people where possible, and the scores are kept for [six months]. We ask about health or disability before a job offer only where the law allows, for example to make adjustments to the interview.

5. Disability and reasonable adjustments

If you are disabled, or become disabled, please tell [role] so that we can discuss adjustments. We will take such steps as are reasonable to remove a disadvantage, which may include changes to hours, duties, equipment or place of work. What you tell us is kept confidential and shared only with those who need to act on it.

6. Pay, training and promotion

Pay and benefits are set by [pay structure] and reviewed [annually]. Training and promotion opportunities are open to all who meet the criteria, including people who work part time, flexibly or are on family leave. [We may take positive action permitted by the Equality Act to encourage under-represented groups to apply or to train; selection itself is always on merit.]

7. Your responsibilities

Everyone must treat colleagues, customers, suppliers and visitors with dignity and must not discriminate against, harass or victimise anyone. You can be personally liable for unlawful discrimination. Managers must apply this policy in their decisions, act on concerns promptly and set the standard for their teams. A breach of this policy is a disciplinary matter, and serious cases may be gross misconduct.

8. Raising a concern

If you believe you have been discriminated against, harassed or victimised, raise it with [your manager, or [role] if it concerns your manager], informally if you wish, or under the grievance procedure. We will investigate promptly and fairly, and you will not be treated badly for raising a concern in good faith. Harassment by customers, suppliers or other third parties should be reported in the same way.

9. Training, monitoring and review

Everyone receives equality training at induction and [every two years]; managers receive additional training on recruitment and on handling complaints. [We collect equality monitoring data, which is voluntary and held separately from personnel files, to check that this policy is working.] [Role] is responsible for this policy and reviews it every year. Last reviewed: [date].

Is an equal opportunities policy a legal requirement?

No. Nothing in the Equality Act 2010 requires one, and the Equality and Human Rights Commission lists an equality policy under advice that "is not a legal requirement". Acas says: "A good start is to have a workplace policy covering equality, diversity and inclusion. This might also be called an 'equal opportunities policy'."

The reason to have one is section 109 of the Act. "Anything done by a person (A) in the course of A's employment must be treated as also done by the employer", whether or not the employer knew or approved. The employer's defence is to show that it "took all reasonable steps to prevent" the employee from doing it. A policy alone will not make out that defence, but its absence makes the defence very hard to run. The steps that count are the ones around it: training, acting on complaints and reviewing what happened.

What are the nine protected characteristics?

Section 4 of the Act lists them: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Two details are worth knowing when you train managers:

- Harassment protection does not extend to marriage and civil partnership or to pregnancy and maternity as such, though the same conduct will often be harassment related to sex.
- Indirect discrimination does not apply to pregnancy and maternity as a characteristic; such cases are usually brought as indirect sex discrimination.

What is positive action, and is it allowed?

Positive action is lawful and voluntary. Where an employer reasonably thinks that people who share a protected characteristic suffer a disadvantage, have different needs or take part in disproportionately low numbers, the Act does not prohibit proportionate action to address it, such as targeted advertising or training. In recruitment and promotion, a protected characteristic may be used only as a tie-break between candidates who are as qualified as each other, and not as a blanket policy.

gov.uk draws the line plainly: "Positive action is entirely voluntary" and "Positive discrimination is unlawful in Great Britain."

What is changing in 2026 and 2027?

- Change - Who - Status
- Sexual harassment added to whistleblowing law - All employers - In force since 6 April 2026
- Action plans on the gender pay gap and menopause support - 250 or more employees - Voluntary since 6 April 2026; due to become mandatory in 2027
- Duty to take "all reasonable steps" to prevent sexual harassment - All employers - Due on 30 October 2026
- Liability for harassment by third parties - All employers - Due on 30 October 2026
- Ethnicity and disability pay gap reporting - 250 or more employees - Proposed; no legislation yet

Clause 8 of the template already asks staff to report harassment by customers and suppliers, so the policy will not need rewriting when the third-party rule arrives. The steps an employer should take are in the harassment prevention duty guide and the anti-harassment policy template.

How do you make the policy count?

- Train on it, and record who attended. The reasonable steps defence turns on what people were actually told and when.
- Use it in recruitment. Score every candidate against the same criteria with the interview scorecard; see fair recruitment.
- Act on the first complaint. A policy that was ignored when it was tested is worse evidence than no policy.

- Review it yearly and after any complaint, and give it to every new starter with the rest of the handbook.
- A free template from CoDash - codash.co.uk/templates. Edit it to match how your company actually works, and take advice on anything unusual.