

EQUAL OPPORTUNITIES & ANTI-HARASSMENT POLICY

SECTION A – EQUALITY OF OPPORTUNITY

1. Background

- 1.1 The Company is an equal opportunity employer. We are committed to ensuring within the framework of the law, that our workplace is free from unlawful discrimination on the grounds of race, religion or belief, sex, sexual orientation, gender reassignment, age, marital status, disability, pregnancy or maternity.
- 1.2 We aim to ensure that our employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria. We have adopted the following equal opportunity policy as a means of helping to achieve these aims.

2. Implementing equality of opportunity

- 2.1 Recruitment and employment decisions will be made on the basis of fair and objective criteria.
- 2.2 The requirements of job applicants and existing members of staff who have a disability will be reviewed, to ensure that wherever possible reasonable adjustments are made, to enable them to enter into or remain in employment with us. Promotion opportunities, benefits and facilities of employment will not be unreasonably limited and every reasonable effort will be made to ensure that disabled staff participate fully in the workplace.
- 2.3 Person and job specifications will be limited to those requirements which are necessary for the effective performance of the job. Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary.
- 2.4 All staff have a right to equality of opportunity and a duty to implement this policy. Breach of the Equal Opportunities Policy is potentially a serious disciplinary matter. Anyone who believes that he or she may have been disadvantaged on discriminatory grounds is entitled to raise the matter through the grievance procedure.

SECTION B – ANTI-HARASSMENT

3 Background

- 3.1 We are committed to providing a working environment free from harassment and ensuring all staff are treated, and treat others, with dignity and respect.

3.2 This policy covers harassment which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers harassment by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

4 What is harassment?

4.1 Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

4.2 It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

4.3 Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

4.4 Harassment may include, for example:

4.4.1 unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;

4.4.2 unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);

4.4.3 offensive emails, text messages or social media content; or

4.4.4 mocking, mimicking or belittling a person's disability.

4.5 A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

5 If you are being harassed

5.1 If you are being harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager or the Human Resources Department, who can provide confidential advice and assistance in resolving the issue formally or informally.

5.2 If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.

5.3 We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible.

5.4 Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

6 Protection and support for those involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

7 Record-keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.