



EQUAL OPPORTUNITIES

The Company is fully committed to providing a harmonious working environment in which all employees are able to maximise their full potential and to contribute to business success.

The Company is committed to identifying and eliminating discriminatory practices, procedures and attitudes throughout the organisation. The Company believes that all employees are entitled to be treated with dignity and respect while at work and also when representing the business in any capacity outside of work. The Company expects employees to support this commitment and to assist in all possible ways.

The aim of this policy is to prevent discrimination, harassment and bullying, to provide guidance to resolve any problem should it occur and prevent recurrence.

Preventing Discrimination in Employment

The Company endeavours to ensure that no employee or job applicant is discriminated against, either directly or indirectly, on the grounds of sex, age, gender reassignment, pregnancy, colour, race, nationality, or ethnic or national origins, sexual orientation, disability or religion or belief or because someone is married. This commitment applies to all the aspects of employment outlined below:

- Recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
- Training.
- Promotion and career development opportunities.
- Terms and conditions of employment, and access to employment-related benefits and facilities.
- Grievance handling and the application of disciplinary procedures.
- Selection for redundancy.

Harassment & Bullying

Harassment is unwanted conduct that may be related to sex, race or ethnic or national origins, disability, sexual orientation, religion or belief, age or any other personal characteristic directed towards an employee by a fellow employee (or group of employees) which:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, or
- is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

Bullying is defined as persistent behaviour against an individual that is intimidating, degrading, offensive or malicious and undermines the confidence and self-esteem of the recipient. It is the impact of this behaviour which is relevant, not the motive or intended aim.



Examples of bullying/harassing behaviour may include (but are not limited to):

- spreading malicious rumours, or insulting someone by word or behaviour (particularly on the grounds of race, sex, disability, sexual orientation and religion or belief)
- copying memos that are critical about someone to others who do not need to know
- ridiculing or demeaning someone, picking on them or setting them up to fail
- exclusion or victimisation
- overbearing supervision or other misuse of power or position
- unwelcome sexual advances - touching, standing too close, the display of offensive materials
- using threatening behaviour/language; making threats or comments about job security without foundation
- deliberately undermining a competent worker by overloading and constant criticism
- preventing individuals progressing by intentionally blocking promotion or training opportunities.

Bullying and harassment are not necessarily face to face. They may also occur in written communications, email, phone, and automatic supervision methods such as computer recording of downtime from work or the number of calls handled, if these are not applied to all workers.

Bullying and harassment make someone feel anxious and humiliated. Feelings of anger and frustration at being unable to cope may be triggered. Some people may try to retaliate in some way. Others may become frightened and de-motivated. Stress, loss of self-confidence and self-esteem caused by harassment or bullying can lead to job insecurity, illness, absence from work, and even resignation.

Employees' Responsibilities

Employees can be held personally liable as well as, or instead of, the Company, for any acts of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Every employee is required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination; all employees have the right to work in an environment which is free from any form of harassment. All employees have a responsibility to help ensure a working environment in which the dignity of employees is respected; employees must ensure their behaviour towards colleagues, clients or customers does not cause offence and could not in any way be considered to be harassment.

Acts of discrimination, harassment, bullying or victimisation or malicious complaints against employees or customers are disciplinary offences. Conduct of this type will often be gross misconduct which can lead to dismissal without notice.

The Company fully recognises employees' rights to complain about bullying or harassment should either/both occur and recommends the following procedure:

Informal Complaint

Where an employee does not view the complaint as serious or where it is not repeated and the employee simply wants the behaviour to stop, they should approach the perpetrator directly, making it clear to the person(s) that their behaviour is not acceptable, is not welcome and that it should be stopped.

Where the employee finds this difficult or embarrassing, they may ask their manager or HR to approach the alleged perpetrator informally on their behalf.



Formal Complaint

The formal complaints procedure is appropriate if the employee views any behaviour to which they have been subjected as serious, if they prefer this method or if the behaviour continues after the informal complaint has been made. All formal complaints will be dealt with seriously, promptly and confidentially under the Company's Grievance Procedure.

Formal complaints should be made in accordance with the Company's Grievance Procedure. An investigation will be conducted to clarify and formally record the nature of the complaint and the events surrounding the complaint, and will include meetings with anyone who can assist with the investigation. During this time, every effort will be made to distance the associated parties from each other.

If an Employee is Accused of Discrimination or Harassment

If an employee is accused of acting in a discriminatory manner towards a fellow employee or a job applicant, or if they are accused of harassment, they will be given a proper opportunity to rebut the allegation as part of the investigation, and provide an explanation of their actions.

If it is concluded that the allegation was inaccurate, this will be the end of the matter. If it is concluded that a false claim has been maliciously made against the employee, the person or persons responsible may be subject to disciplinary action.

If it is concluded that the employee has acted in a discriminatory manner, or has abused the dignity of a fellow employee or worker, their manager will consider what action to take. This may range from counselling to formal disciplinary action, including dismissal in serious cases.

Management Responsibilities

Managers are the guardians of equality of opportunity and ensuring employees have the right to work without fear of victimisation, harassment or bullying within their areas of responsibility. Equal Opportunities and dignity at work are part of the larger management responsibility of ensuring that the employment environment provides employees with motivation to do a good job. This will be impossible to achieve if individuals feel that they are being treated unfairly.

Where problems or complaints arise, managers must take these seriously and make sure they are fully investigated and that any necessary follow-up action is taken. This may include initiating disciplinary action against employees who have committed acts of discrimination or harassment.

Monitoring

Finally, remember that equality of opportunity is about good and effective employment practice, and about creating an environment in which everybody can be assured that their contribution is valued. The Company will not tolerate harassment or bullying of any kind in the working environment and will take positive action to prevent its occurrence.

Equal Opportunities practice is developing constantly as social attitudes and legislation change. The Company will monitor the effectiveness of its policies and will implement changes where these could improve equality of opportunity. This commitment applies to all the Company's employment policies and procedures, not just those specifically connected with equal opportunity.