

## **Commitment to equal opportunities**

We are committed to the principle of equal opportunities in employment. We are opposed to any form of less favourable treatment or financial reward through direct or indirect discrimination, harassment, victimisation to employees or job applicants on the grounds of race, religious beliefs, political opinions, creed, colour, ethnic origin, nationality, marital/ parental status, sex, sexual orientation or disability and to any form of less favourable treatment on the grounds of handicap or age.

We recognise our obligations under the Sex Discrimination Act, The Equal Pay Act, Article 119 of the Treaty of Rome, The Race Relations Act, The Employment Equality (Sexual Orientation) Regulations 2003 and The Employment Equality (Religion or Beliefs) Regulations 2003, the Employment Equality (Age) Regulations 2006, and The Codes of Practice published by the Equal Opportunities Commission, the Commission for Racial Equality and the European Commission:

- for the elimination of discrimination on the grounds of sex, sexual orientation or marital status and for the promotion of equal opportunity in employment;
- for the elimination of discrimination on the grounds of religion or beliefs;
- for the elimination of racial discrimination and the promotion of equal opportunity in employment;
- for the elimination of discrimination on grounds of age;
- for the elimination of discrimination in pay between men and women who do the same work, or work of a similar nature or work of equal value.

## **Employment practices**

You have a personal responsibility to adhere to the principles of equal opportunity and maintaining racial harmony. We will actively promote equal opportunities in our business to ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential skills and abilities. Employees will be recruited and selected, promoted and trained on the basis of objective criteria. Sexual, racial and other forms of harassment will not be tolerated. We will treat unfair discriminatory conduct by any member of staff as a disciplinary offence.

## **Monitoring and review arrangements**

We will regularly monitor our policies to ensure that we pursue an effective policy of equal opportunity.

## **Grievance and disciplinary procedures**

We will ensure that any employee who feels that he or she has been treated unfairly or subjected to direct or indirect unfair discrimination can raise the matter through the appropriate grievance procedure when every effort will be made to secure a satisfactory resolution. Any employee making a complaint of unfair discrimination will be protected from any victimisation in any form.

## **Training**

We will train, develop and promote on the basis of merit and ability and encourage employees and applicants from all races.

## **Rehabilitation of offenders**

We will not discriminate against anyone who has a spent conviction under the Rehabilitation of Offenders Act 1974.

## Equal pay

Men and women are entitled to be paid equally without any bias on the grounds of sex and that this right is set out in the Treaty of Rome and is enforceable under UK Law.

All reasonable steps will be taken to ensure that male and female staff receive equal pay for the same work and for work rated as equivalent and for work of equal value.

## Harassment at work

Harassment is unsolicited and unwelcome workplace behaviour that adversely affects the dignity of the recipient. Where such behaviour is motivated by gender, sexual orientation, marital status, race, colour, national or ethnic origin, nationality, age or disability it also amounts to infringement of equal employment opportunity.

We are committed to ensuring that no harassment or victimisation at work, whatever the motivation, is over-looked or condoned. Such behaviour can range from extreme forms such as violence or bullying to less obvious actions like practical jokes and ridiculing colleagues or subordinates.

Conduct becomes harassment if it persists after the recipient has made clear that it is regarded as offensive, although a single offensive act can amount to harassment if it is so serious as to be obviously offensive towards the recipient.

Any form of harassment is a potential disciplinary matter.

## Sexual harassment at work

Sexual harassment is a particular form of harassment. It is conduct at work directed towards an employee by another employee or

group of employees which is of a sexual nature, or which is based on a person's sex, and which is regarded as unwelcome or offensive to the recipient.

The following examples illustrate the sort of conduct that may be treated as sexual harassment:

- unwanted physical contact, or conduct which is intimidating, or physically or verbally abusive.
- Harassment can also be non-verbal, for example, staring or gestures;
- suggestions that sexual favours may further a person's career, or that refusal may hinder it;
- sexual advances, propositions, suggestions or pressure for sexual activity at or outside work;
- derogatory or demeaning remarks based on gender, or the display of sexually explicit material in the workplace.

Sexual harassment is a denial of equal employment opportunity and has the effect of insulting and demeaning the employee who is harassed.

## Racial discrimination

Racial harassment is a particular form of harassment. It is conduct at work directed towards an employee by another employee or group of employees which is of a racial nature, or which is based on a person's race, colour or origins, and which is regarded as unwelcome or offensive to the recipient.

The following are examples that illustrate the sort of conduct that may be treated as racial harassment:

- Jokes about race.

- Offensive names used.
- References to people by offensive racist descriptions.
- Verbal or physical abuse because of a person's race or colour.
- Detrimental behaviour because of a person's race.
- Denial of opportunity because of race.

This policy applies to verbal and physical actions as well as any other form of communication including electronic communication such as text messages, emails, and faxes as well as written communications.

If you believe you are the subject of harassment you should make a formal complaint. Depending on the seriousness of the allegation, the alleged harasser may be suspended on full pay while the matter is being investigated under our disciplinary procedures.

The aim throughout is to resolve the complaint of harassment sensitively, impartially, effectively and quickly.

There will be no victimisation of any employee for making or supporting or assisting a complaint of harassment – even if the complaint is not upheld – provided the action was taken in good faith.

## **Age discrimination**

Discrimination or harassment on grounds of age by employers is prohibited in the areas of recruitment, promotion and training. There can be direct and indirect age discrimination.

It is unlawful for an employer to discriminate against a person in the arrangements made

for the purpose of determining to whom employment should be offered; in the terms on which that person is offered employment; and by refusing to offer, or deliberately not offering, employment.

Similarly, it is unlawful for an employer to discriminate against that person in the terms of employment; in the opportunities for promotion, a transfer, training, or receiving any other benefit; by refusing or deliberately not affording that person any such opportunity; or by dismissing or subjecting that person to any other detriment.

There are certain circumstances when some of the Regulations may not apply in relation to genuine occupational requirements of employment.

## **Resolving harassment**

A situation of harassment may be resolved informally, by talking directly to the person who is responsible for the harassment. However if you believe you are the subject of harassment you should make a formal complaint to your Manager, if the complaint is about your Manager, to a Director. Depending on the seriousness of the allegation, the alleged harasser may be suspended on full pay while the matter is being investigated under the Company's disciplinary procedures.

A formal complaint of any form of harassment will be fully investigated. The alleged harasser will be informed of the complaint, and we will endeavour to ensure that an investigation into sexual harassment is conducted by a worker of the same sex as the complainant. If relevant, as part of the investigative process, witnesses will be interviewed. As far as possible, confidentiality will be maintained

throughout the investigative process. Neither complainant nor alleged harasser will be victimised in any way. However, the making of a malicious complaint that you know to be false may itself result in disciplinary action against the employee because it could be regarded as misconduct.

Where an employee is found to have harassed another employee, the Company will decide the appropriate action (if any) in the light of all the evidence. Such action may include disciplinary action, dismissal (in serious or repeat cases), a job transfer, or counselling.

The aim throughout is to resolve the complaint of harassment sensitively, impartially, effectively and quickly. Where a harasser is retained in employment, the Company will monitor the situation to ensure that the harassment has stopped. It is a disciplinary offence to victimise or retaliate against an employee who has, in good faith, made, supported or assisted in the making of a complaint of harassment. There will be no victimisation of any employee for making or supporting or assisting a complaint of harassment - even if the complaint is not upheld - provided the action was taken in good faith.