

10. Equal Opportunities Policy

This policy sets out and explains:

- our equal opportunities policy and complaints procedure;
- your responsibility in making sure our policy is upheld;
- what to do if you have any special requirements; and
- the role of the General Manager and sources of further support.

If, at any time during your employment, you wish to discuss an equal opportunities matter, you are encouraged to contact the General Manager.

10.1 Our Policy

We are totally committed to the principle of equal opportunities and to creating a working environment in which you are treated with dignity and respect, that is free from unlawful discrimination, victimisation or harassment on grounds of:

- colour, race, nationality or ethnic or national origin;
- marital or civil partnership status
- pregnancy or maternity;
- disability of any kind;
- Religion or belief;
- sex , sexual orientation or gender reassignment;
- age; and
- trade union membership.

Our commitment applies to all aspects of employment including:

- recruitment and the advertisement of jobs;
- terms and conditions of employment;
- training, career development and progression;
- grievance and disciplinary procedures; and
- relationships between members of staff.

We take this policy very seriously. A breach of this policy is considered to be gross misconduct and disciplinary action, including dismissal for serious offences, will be taken against people who do not comply with it.

10.2 What is Discrimination?

Broadly, a person has been discriminated against if:

- they have been treated less favourably than another person on any of the grounds set out above; or
- a procedure or practice places a group of employees at a disadvantage on any of the above grounds; or
- they have a disability and reasonable steps have not been taken to meet their needs.

10.3 What is Harassment?

Harassment is unwanted conduct which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Harassment is unlawful where it is motivated by one of the grounds set out above but we include more general harassment within our definition. Although not exhaustive, the following are examples of types of behaviour that may amount to harassment:

- physical assault;
- physical or verbal abuse;
- threats;
- suggestive comments or gestures;
- offensive gestures, language, gossip or jokes;
- insulting or abusive behaviour or comments;
- isolation or exclusion;
- bullying;
- unreasonable persistent criticism or humiliation;
- unfair allocation of work or responsibilities.

10.4 What is Sexual Harassment?

Sexual harassment is one form of harassment. Generally it involves behaviour towards another, where the perpetrator knows or should know that the behaviour is unwelcome because it is offensive and is perceived to be of a sexual nature.

Although not exhaustive, the following are examples of types of behaviour that may amount to sexual harassment:

- Physical conduct of a sexual nature - unwanted physical conduct, including unnecessary touching, brushing against another employee's body.

- Verbal conduct of a sexual nature - unwelcome sexual advances, continued suggestions of social activity outside work after it has been made clear that this is unwelcome.
- Non-verbal conduct of a sexual nature - the display of sexually suggestive or pornographic pictures or the sending of sexually harassing messages or images through electronic mail.
- Sex-biased conduct - Conduct that denigrates, ridicules, is intimidatory or physically abusive of an employee because of their sex, marital status, gender reassignment or sexual orientation.

Sexual harassment by someone of the same sex as the victim also amounts to harassment.

10.5 What is Victimisation?

Someone is victimised where they suffer unfavourable treatment because they have, in good faith, made a complaint under this policy, acted as a witness or accompanied a complainant to a hearing.

10.6 Responsibilities

10.6.1 What are my responsibilities as someone who works at the Company?

It is your obligation to be sensitive about the impact that you have on others and behave in a way that supports our policy when dealing with everyone that you come into contact with as part of your employment with the Company. Our policy is not designed to discourage normal social relations among colleagues or with the public but aims to prevent discrimination, harassment or victimisation.

Our policy applies not only at Company's premises but anywhere you are working as part of your employment with the Company. This includes any social occasions organised by the Company.

You must not instruct or aid someone to carry out an act of discrimination, harassment or victimisation or condone discrimination, harassment or victimisation by others. You must report any incidents to the General Manager.

10.6.2 What is my responsibility as a line manager?

In addition to the general responsibilities above, it is also your responsibility to make sure that your team are aware of and are complying with this policy.

10.7 The Complaints Procedure

We aim to resolve any complaints as quickly as possible. All complaints will be treated seriously and confidentially. Only complaints that relate to a breach of this policy should be made using this procedure. Complaints about other matters should be made using our grievance procedures.

10.7.1 What do I do if I am experiencing, harassment or victimisation?

You should consider whether it is appropriate to raise the matter directly with the person concerned in order to resolve the problem. If it is not, you should speak to your Line Manager. If you feel unable to discuss the matter with your line manager then you should discuss it with the Business Manager.

Following your discussion, you will be asked to choose one of the following options:

- agree that no further action is necessary;
- agree to discuss the complaint with the individual who is alleged to have caused offence;
- ask your Line Manager to help to resolve the matter through informal and/or discreet approaches; or
- make a formal written complaint to your Line Manager.

If you are not satisfied with an informal approach, a formal complaint can be made at any stage.

10.7.2 How do I make a formal complaint?

Employees who do not feel that an informal complaint has been dealt with adequately or appropriately and/or who do not feel comfortable approaching their line manager in an informal manner, should raise a grievance under the Company's Grievance Procedure.

10.7.3 What will happen if a formal complaint about a person is upheld?

Where a formal investigation has been conducted and where it has been reasonably concluded that some form of discrimination, harassment or victimisation may have taken place, those responsible will be subject to our normal disciplinary procedures.

The outcome of the disciplinary procedures will depend upon the circumstances. Serious acts of discrimination, harassment or victimisation will be regarded as gross misconduct and may lead to summary dismissal.

10.7.4 Am I protected if I make a complaint, act as a witness or accompany a complaint to a hearing?

Yes. Any acts of retaliation or intimidation against an employee will be treated as a disciplinary offence. However, an employee who maliciously makes an unfounded complaint in bad faith will be subject to disciplinary action.

13.7.5 What if the complaint is about someone who is not employed by the Company?

Appropriate action to deal with the problem will be discussed with you.

10.8 Special Requirements Relating to Equal Opportunities

10.8.1 What is meant by special requirements?

We understand that people's needs at work are different and that some employees may have special requirements. For example, employees of a particular religion may need somewhere quiet to pray during their lunch break, need to take holiday on a particular day for a religious event, or need to have somewhere to store specially prepared foods. Alternatively you may have a disability and may feel that you need to have changes made to your workplace to help you do your job.

We will accommodate your requirements where it is possible and practical for us to do so but we cannot do so unless you let us know. Where you need particular time off, or are requesting a temporary change to your working hours, your line manager is more likely to be able accommodate this if you let them know well in advance.

10.8.2 What should I do if I have any special requirements?

You should discuss your requirements with your line manager. They will seek advice, if they need it, from the General Manager. If you feel unable to discuss your request with your line manager, you can raise it directly with the Business Manager.

10.9 Support from the Company

With the assistance and co-operation of senior management and other employees, we will take steps to ensure universal compliance with this policy. These will include a regular review of the policy, raising awareness of equality issues, monitoring activities and complaints.

Signed: 

Oliver Viney (Managing Director)

13 November, 2017