

Please contact the HR Department or your immediate manager if you have any questions regarding the Equal Opportunities, Bullying and Harassment Policy or any issues covered by it.

### **Purpose**

The Company is an equal opportunities employer and is committed to providing equality of opportunity, treatment and dignity for all employees regardless of gender, race, colour, national or ethnic origin, religious belief, marital status, sexual orientation, disability, political convictions, membership or non-membership of a Trade Union, age, “spent convictions of ex-offenders”, pregnancy or maternity.

The Company strives to maintain the highest standards of employee conduct and ethical behaviour at all times including when operating abroad and managing its supply chain.

Furthermore, the company maintains a strict policy prohibiting harassment, whether this is sexual, verbal, physical, visual or bullying. This policy applies to all company agents, contractors, temporary workers and employees.

### **Definitions**

Direct discrimination - refers to actions, policies or procedures that would treat a person less favourably, due to one or more of these grounds (protected characteristics), than others are or would be treated in the same or similar circumstances.

Indirect discrimination - is applying a requirement or condition which, although applied equally to all personnel, is such that a substantial proportion of a particular group cannot comply with it, and the requirement or condition cannot be shown to be justifiable.

Associative Discrimination – refers to direct or indirect discrimination because of the individual’s association with someone who has a protected characteristic or because someone thinks they have a protected characteristic.

### **Principles**

- The Company will not allow discrimination in any form other than merit.
- Every employee and manager is responsible for the implementation of this policy.
- Disciplinary action will be taken against any employee who is found to have acted in any way which is in breach of this policy.

### **Equal opportunities in employment**

The organisation will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

### **Areas For Consideration**

#### **I. Recruitment and Selection**

The Company aims to ensure that all adverts are non-discriminatory on the basis of gender, race or disability, either in working or intent.

Job descriptions and person specifications should only include those criteria essential for the job. The job advert should then be based on the person specification.

All academic qualifications should be listed as “or equivalent” so that they are not limited to people who have taken British qualifications only.

All applicants should be asked whether they have any special requirements, either due to a disability or otherwise, on being invited to interview and any reasonable adjustments made.

Any request for job share or part time working should be considered, if suitable for the position. Please refer to the Company policy on flexible working for further information.

There should ideally be two people from the Company side present at interviews, in order to reduce subjectivity. They should use the criteria set by the person specification in order to assess the suitability of the candidate. This is to ensure that the best person for the position is selected solely on the basis of suitability and ability.

Any selection methods used, eg psychometric tests, aptitude tests, should be considered with regard to relevance and as to whether they could cause indirect discrimination.

Everyone who conducts selection interviews should be trained in recruitment and selection including the importance of avoiding discriminatory questions.

## **II. Training and Development**

Training and development opportunities should be available to all employees regardless of gender, race, colour, national or ethnic origin, religious belief, marital status, sexual orientation, disability, political convictions, membership or non-membership of a Trade Union, age or “spent convictions” of ex-offenders.

All employees should go through the Company’s induction procedure.

All employees should be informed of relevant training courses.

Alternative dates should be considered for part time employees, or employees who can’t attend courses at certain times / days due to observance of religious beliefs etc.

## **III. Promotion and Assessing Performance**

All managers should be trained in performance related review procedures to minimise bias.

Internal candidates should be given first consideration for any promotion opportunities.

All employees will be informed of promotion opportunities, even if they are out of the office, e.g. on maternity leave, at the time.

Promotion will be on the basis of suitability and ability only.

## **IV. Employee Relations/Handling Discipline and Grievance Issues**

All employees will be treated equally under the Company’s Policies and Procedures regardless of gender, race, colour, national or ethnic origin, religious belief, marital status, sexual orientation, disability, political convictions, membership or non-membership of a Trade Union, age or “spent convictions” of ex-offenders.

## **Procedure for Dealing with Bullying and Harassment**

The work environment should be free of bullying, harassment and intimidation, whether it is of a sexual, racial or other origin.

It is the Company’s responsibility to ensure that all complaints of bullying and harassment are fully investigated and prompt action taken to transfer and/or discipline the perpetrator. Bullying and

harassment may be considered to be gross misconduct, and perpetrators may be subject to summary dismissal under the disciplinary rules.

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

Harassment, in general terms, is unwanted conduct affecting the dignity of men and women in the workplace. It may be related to age, gender, race, disability, religion, nationality or any personal, associative or perceived personal characteristic of the individual, and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.

Examples of bullying and harassment include, but are not limited to:

- spreading malicious rumours, or insulting someone (particularly on the grounds of race, gender, 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;
- unfair treatment;
- overbearing supervision or other misuse of power or position;
- unwelcome sexual advances — touching, standing too close, display of offensive materials;
- 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.

Any employee who believes that some form of discrimination, harassment or bullying is occurring should consult on a confidential basis with their Manager/Vice President or where necessary a Manager/Vice President of their choice, using the grievance procedure. The Manager/Vice President will investigate and take the appropriate action.

Any employee who retaliates against an employee for complaining about harassment will be disciplined as will any employee who makes a false allegation of harassment with malicious intent.

### Document Control

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