

## Equal Opportunities Policy

### Equality of Opportunity

The Company is committed to ensuring all staff – whether temporary or permanent, full-time or part-time, and regardless of race, disability, gender, gender reassignment, pregnancy or maternity, religion or belief, marriage or civil partnership, sexual orientation or age (protected characteristics for the purposes of the Equality Act 2010) or any other unlawful reason – are treated fairly and are offered access to opportunities on an equitable basis. The Company is committed to avoiding unlawful discrimination and will not tolerate harassment, victimisation or discrimination. The remit of the policy extends to – but is not limited to – recruitment, training, rewards, benefits, promotion and development.

### Complaints covered by this Policy

The procedure within this policy should be used for complaints relating to discrimination, unequal treatment or lack of access to opportunities in relation to all aspects of employment because of a protected characteristic such as:

- race, including colour, nationality, ethnic or national origins;
- sex, marital status, civil partner or gender reassignment;
- pregnancy or maternity;
- disability of any kind;
- religion or belief;
- sexual orientation;
- age; and
- trade union or Staff Consultative Committee membership.

### Informal Stage

If you want to raise a complaint about discrimination, you should consider whether it is appropriate to raise the matter directly with the person concerned in order to resolve the problem informally. If this is not appropriate, you should speak with your manager. If you feel unable to speak to your manager, then you should speak with another senior manager in the first instance.

After 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 employee who is alleged to have caused offence;
- ask your manager or the senior manager to help to resolve the matter through informal and/or discreet approaches; or
- make a formal written complaint to your manager.

If you are not happy with an informal approach, you can make a formal complaint at any stage.

## Formal Stage

Sometimes you may not be able to resolve your complaint informally. In this case you need to formalise your complaint by putting it in writing, and signing and dating your letter. You should write a new letter to trigger each stage of the process.

Stage 1 – will be heard by a manager or Director. They will consider and respond to your complaint in writing, normally within 20 days of receiving your letter. If you do not feel that your complaint has been appropriately dealt with you can go to Stage 2.

Stage 2 – will be heard by a Director or their nominated representative. You should submit your letter within ten working days of receiving the outcome from Stage 1. A meeting will then be held with you to discuss your grievance. You will be told the result of your complaint in writing within 20 days of the Director (or their nominated representative) receiving your letter. This decision will be final.

## Investigation

We will investigate the allegations carefully and as discreetly as possible. Where possible, those conducting the investigation will not be directly involved in the allegation, and the extent of the investigation will depend on the particular circumstances of the case. You can expect detailed accounts to be taken from all relevant parties, including witnesses. Other employees may be asked to provide information. Documents, emails, and other evidence may be considered. Notes will be kept of any evidence collected or interviews conducted. You will get a full record of the outcome of the investigation and any steps taken.

## Right to be accompanied

You may be accompanied at investigatory meetings by a companion. This can be a fellow employee of your choice or a trade union representative.

## Timelines

The timelines provided in this procedure are intended as a guideline but there may be occasions where it may not be possible to meet the timelines. In such circumstances you will be told the date by which you can expect a response and every effort will be made to complete the process as quickly as possible.

## 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 may have taken place, those responsible will be subject to our normal Disciplinary Policy. Action will not normally be initiated



without the agreement of the employee raising the complaint but there are some circumstances where the Company may need to pursue the matter formally. For example, if other people could be at risk if no action is taken. The outcomes of the Disciplinary Procedure will depend on the circumstances. Serious acts of discrimination will be regarded as gross misconduct and may lead to dismissal without notice or pay in lieu of notice.

## **What will happen if a formal complaint about a person is not upheld?**

In some circumstances, even where a complaint has not been upheld, consideration may be given to how to manage the on-going working relationship between the complainant and the person who has allegedly discriminated, which may include transferring one, or both, to different posts or physically altering their location in the office.

## **What should I do if I have a complaint about a customer, supplier or other people not employed by the Company?**

Employees should report any bullying, harassment or discrimination by customers, suppliers, visitors, or others to their manager who will take appropriate action.

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