



Equal Opportunities & Harassment Policy

This policy applies to all companies within the Relyon Group.

The Company is committed to providing excellent client service by maintaining the highest standards of professional excellence.

As part of this continuing commitment to this objective the Company aims to promote equality and diversity in all our policies, practices, procedures and in all those areas in which we have influence.

The Company's aim is to always recruit, train and promote the best person for the job and to create a working environment free from unlawful discrimination, victimisation and harassment in which all employees are treated equally and with dignity and respect.

To meet this objective, the Company have a policy of recruiting and developing people suitable qualifications, experience and personal attributes into all roles, regardless of gender, gender identity, marital status, sexual orientation, age, ethnic origin, nationality, religion or disability of any kind.

All employees will be made aware of the requirements of this policy and will be obliged to co-operate to ensure that the policy is carried out effectively. This policy will be available in the Employee Information Handbook which is issued to all staff upon commencement of employment.

Any form of discrimination may be unlawful and will be treated as a disciplinary offence resulting, if appropriate in disciplinary action.

Scope of the Equal Opportunities Policy

This policy applies to the advertisement of jobs, recruitment, selection, counselling, appraisal, training, conditions of work, pay and every other aspect of employment.

All employees are required to comply with the policy when dealing with other employees (including agency, temporary staff and consultants), job applicants, clients, suppliers, customers and contacts of the Company and anyone else with whom they come into contact with during the course of their employment.

Recruitment

The company will ensure that information about job opportunities will be circulated as widely as possible in the circumstances to ensure that it reaches all sections of the community regardless of colour, race, nationality, ethnic origin, marital status, disability, religious belief, age, gender or sexual orientation.

All applicants will be welcomed and will be considered on the relative merits of the applicant against the requirements of the job and/or person specification for the position regardless of colour, race, nationality, ethnic origin, marital status, disability, religious belief, age, gender or sexual orientation.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the vacancy.

If there is a genuine and lawful reason for limiting the vacancy to a particular group, this will be clearly stated and the grounds for it, on any advertisements.

Applicants may be asked to complete a diversity monitoring form to assist in the maintenance of records and for monitoring purposes. This form will be kept separate from all other application documents and will not form part of the selection process.

Terms and Conditions of Employment

The company will ensure that terms and conditions of any employee are free from all forms of direct and indirect discrimination and apply equally regardless of colour, race, nationality, ethnic origin, marital status, disability, religious belief, age, gender or sexual orientation.

No requirement or conditions will be imposed, directly or indirectly, which will or might place any group of employees at unfair or unlawful advantage.

Training, Career Development and Promotion

All employees will be provided with the appropriate training to enable them to improve their performance and to achieve the performance standards set for them by the Company regardless of colour, race, nationality, ethnic origin, marital status, disability, religious belief, age, gender or sexual orientation.

All training, development and promotion opportunities will be published widely to all appropriate employees and not such in a way as to exclude or disproportionately reduce the numbers of applicants from a particular group.

Decisions on promotion and career management will be based solely on objective and job-related criteria.

Selection, recruitment, training, promotion and employment practices generally will be subject to regular review to ensure that they comply with the Company's commitment to promote equality and diversity throughout its business.

Disability Code of Conduct

The Company will take all reasonable steps to ensure that the working environment, working practices and terms and conditions of employment do not prevent disabled people from taking up positions for which they are suitably qualified and, in all other respects, the best person for the job.

The Company will bear in mind the desirability of avoiding barriers to the employment of disabled people when acquiring and fitting out buildings with equipment and devising working practices.

The Company will make reasonable adjustments to the working environment, to working practices and to terms and conditions of employment so as to ensure that no particular disabled person is placed at an unreasonable disadvantage.

A decision not to make an adjustment which might enable or assist an employee or a prospective employee to be employed in a particular post will not be taken below the level of Operations Manager. Before making such a decision, the Operations Manager will ensure that all possible adjustments have been investigated, including consultation with the employee or prospective employee concerned and any appropriate expert advice.

The Company will encourage the participation of disabled employees to ensure that wherever possible, its employment practices recognise and meet their needs and will consult disabled employees on action to make sure they develop and use their abilities at work.

Discrimination and Harassment

The Company is committed to providing a workplace where everyone has the right to work in an environment which promotes equal opportunities and prohibits discriminatory practices.

As such the Company regards discrimination, harassment, abuse, victimisation or bullying of staff, clients or of others in the course of work as disciplinary offences that could be treated as gross misconduct.

This policy is not designed to discourage normal social relations among colleagues or with the public. Its aim is to prevent discrimination, harassment, abuse, victimisation or bullying.

It is the responsibility of each individual to be sensitive towards the impact that they have on others, not to discriminate against or harass colleagues or condone discrimination or harassment by others.

The policy applies not only to working at the Company's premises and those of any client or contact but also includes travelling or staying away from home whilst on business, at Company/Staff functions or for a reason related to your employment.

Any behaviour under the following headings will not be tolerated in any circumstances by the Company.

Disciplinary action, including dismissal for serious offences, will be taken against any person violating this policy.

Discrimination

A person has been discriminated against if they have been treated less favourably than another on the grounds of gender (including gender reassignment), marital status, age, ethnic origin, colour, nationality or disability of any kind (including physical, sensory and mental disability, sexual orientation, and religious belief).

Harassment

Harassment may take several forms (including bullying), occurs on a variety of different grounds and can be directed at one person or a number of people. Harassment need not be directed at the complainant and can occur if the complainant witnesses another person being harassed.

Harassment involves subjecting an employee to conduct which is unwanted and where the conduct has the purpose or effect of:

- a) violating the victim's dignity; or
- b) creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.

Harassment can occur whether it is intended to be offensive or not, as it is the effect on the victim, which is important, not whether the perpetrator intended to harass them. Harassment or bullying is unacceptable even if it is unintentional.

Sexual harassment involves conduct where a person persists in behaviour towards another and the person knows or ought reasonably to know that such behaviour is unwelcome to the other because it is perceived to be of a sexual nature and offensive.

Sexual harassment is a form of sexual discrimination and as such is unlawful under the Equality Act (2010).

It should be noted that sexual harassment does not necessarily have to be 'sexual' in nature in the sense of being an attempt to initiate sexual relations. It is sufficient that the conduct is 'sex-based'. Therefore any behaviour which ridicules, denigrates or abuses an employee because of his or her sex is harassment.

The following types of behaviour may amount to sexual harassment (this list gives examples only and is not exhaustive):

Physical conduct of a sexual nature (e.g. unwanted physical conduct, including unnecessary touching, brushing against another employee's body or actual assault).

Verbal conduct of a sexual nature, e.g. unwelcome sexual advances, continual suggestions of social activity outside work after it has been made clear that this is unwelcome.

Innuendoes, lewd comments or malicious gossip.

Non-verbal conduct of a sexual nature, e.g. the display of sexually suggestive or pornographic pictures, the sending of sexually harassing messages or images through electronic mail.

Harassing messages or images through electronic mail.

Sex biased conduct, e.g. conduct that denigrates or ridicules, intimidates or is physically abusive of an employee because of his/her sex, marital status or sexual orientation.

Some types of harassment are classed as criminal offences which can lead to prosecution. These include offences under the Protection of Harassment Act 1997 which makes it a criminal offence under section 4 of the Act to cause a reasonable person to fear that violence will be used against them.

Bullying

Bullying may be described as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient. Bullying may be physical, verbal or non-verbal conduct.

Behaviour that is considered bullying by one person may be considered firm management by another.

Victimisation

This can emerge where an employee is adversely treated for raising a complaint or instigating a grievance procedure in respect of one of the heads of discrimination.

Examples

The following types of behaviour will amount to unacceptable conduct under any of the above headings (this list gives examples only and is not exhaustive):

- 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

- Persistent criticism or humiliation
- Unfair allocation of work or responsibilities
- Setting unrealistic targets

Responsibilities of Supervisors and Managers

All supervisors and managers are responsible for eliminating any harassment or intimidation of which they are aware. Failure to do so will be treated as a failure to fulfil all the responsibilities of their position.

Where a supervisor (whether a Director, Manager or other person holding supervisory responsibilities) becomes aware of an allegation of harassment of an employee or of a member of the public in connection with Company's activities, he/she must (whether or not a formal complaint has been made) discuss it with the complainant and, unless the employee expressly requests otherwise, report it to the appropriate Manager.

Responsibilities of Employees

Every employee must take reasonable steps to ensure that harassment does not occur and must report any incidents to the Head of Group Services.

Employees who believe they are victims of harassment may raise the matter with their immediate Supervisor/Manager without the need to make a formal complaint.

Employees who believe they are victims of harassment are encouraged to use the complaints procedure which is part of this Equal Opportunities Policy.

Complaints Procedure

Failure to comply with the Company's Equal Opportunities Policy or to co-operate with it operating effectively is a disciplinary offence which may lead to disciplinary action including dismissal.

It is the Company's aim to resolve any complaints as quickly as possible. All complaints will be treated seriously and with appropriate confidentiality. The complaints procedure is as follows.

Informal Procedure

Employees who believe they have experienced any form of discrimination, harassment or victimisation should wherever possible make it clear to the person responsible that the conduct is unwelcome/unacceptable and ask them to stop the harassing behaviour.

The Company recognises that given the likely nature of the complaints it may not be appropriate for the employee to approach the alleged harasser directly in such circumstances the employee should raise the matter with their supervisor.

If an employee feels unable to discuss the matter with his/her immediate supervisor then they may approach a more senior manager.

Following an initial discussion the employee and the supervisor/manager will agree on the most appropriate method of resolving the matter. A note should be made of this discussion, citing the issues raised, and the agreed method of resolution.

The options which may be considered at the meeting may include but are not limited to;

- An informal discussion between the supervisor/manager and the alleged harasser

- No further action with a record kept of the nature of the complaint.
- A formal written complaint to be dealt with via the grievance procedure.

Where the employee asked the supervisor/manager to discuss the matter with the alleged harasser the supervisor/manager should meet informally with the employee within five working days to discuss the outcome.

If at any stage prior to or during the informal procedure the complaint is put in writing to the Company then the formal grievance procedure will be triggered.

Formal Grievance Procedure

Where the complaint is given in writing or the employee indicates that they wish to make a formal complaint the standard grievance procedure as set out in the Company handbook will be followed with such modifications as are necessary to reflect the sensitive nature of the allegation.

Modifications may be most appropriate during the investigation in order to, where possible, preserve confidentiality.

The Employee should be encouraged to diarise the allegations and the dates on which they occurred. Particular care and consideration will be taken when interviewing the complainant in order to minimise any further stress.

Formal Disciplinary Procedure

Where the investigation uncovers evidence of potential misconduct or gross misconduct on the part of the alleged harasser the formal disciplinary procedure will commence.

The disciplinary procedure will not normally be invoked until the company have spoken with the complaint. However, there are some circumstances where, despite the reservations of the complainant, the Company may need to pursue the matter formally, (for example, where it is felt that other members of staff could be at risk if no action is taken).

Outcome

If it is established that there has been discrimination or harassment, the resulting action will depend upon the circumstances. In serious or persistent cases dismissal may result. Other cases may warrant a warning.

Both parties will be kept informed of the outcome of any procedure.

Where a complaint is not upheld because the evidence uncovered is inconclusive or inconsistent then consideration may be given to alternate means of resolution

The Company may consider redeployment or rescheduling of work in order to minimise future contact between parties.

Employees will be protected from harassment, victimisation or discrimination for making a complaint or assisting in an investigation. Any acts of retaliation or intimidation against an employee will be treated as a disciplinary offence.

An employee who maliciously makes an unfounded complaint will be subject to disciplinary action.

Equal Opportunities Monitoring

The Company is committed to monitoring the effectiveness of this Equal Opportunities and Harassment Policy and the complaints procedure.

The Company will undertake regular reviews into all aspects of our policies, procedures and practices in relation to recruitment, terms and conditions of employment, training, career development, promotion and grievance and disciplinary to identify any trends or patterns emerging and, if so, to analyse whether or not these are justified.

The Company is committed to identifying and taking all steps necessary to eliminate any unjustified discrimination which is revealed by this monitoring process.

Note that the equal opportunities and harassment policy and complaints procedure set out above does not form part of the employees' contracts of employment and may be changed by the Company in its absolute discretion from time to time.

