

EQUALITY AND DIVERSITY POLICY

INTRODUCTION

The Grove Media Limited is committed to a policy of equal opportunity in all aspects of recruitment and employment and to the elimination of unlawful and unfair discrimination. We value the differences that a diverse workforce brings to the organisation and we are determined to build a culture that values openness, fairness and transparency.

It is our policy that all employment decisions are based on merit and the legitimate business needs of the organisation. The Company does not discriminate on the basis of race, colour or nationality, ethnic or national origins, sex, gender reassignment, sexual orientation, marital or civil partner status, pregnancy or maternity, disability, religion or belief, age or any other ground on which it is or becomes unlawful to discriminate under the laws of England and Wales (referred to as Protected Characteristics).

Our intention is to enable all our staff to work in an environment which allows them to fulfil their potential without fear of discrimination, harassment or victimisation. The Company's commitment to equal opportunities extends to all aspects of the working relationship including:

- recruitment and selection procedures;
- terms of employment, including pay, conditions and benefits;
- training, appraisals, career development and promotion;
- work practices, conduct issues, allocation of tasks, discipline and grievances;
- work-related social events; and
- termination of employment and matters after termination, including references.

The principles of non-discrimination and equal opportunities also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

This is a statement of policy only and does not form part of your contract of employment. This policy may be amended at any time by the Company, in its absolute discretion.

WHO IS RESPONSIBLE FOR EQUAL OPPORTUNITIES?

Achieving an equal opportunities workplace is a collective task shared between the Company and all of its staff. This policy and the rules contained in it therefore apply to all employees of the Company irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, casual or agency staff, trainees, homeworkers and fixed-term staff and any volunteers or interns (referred to as Staff).

The board of directors of the Company has overall responsibility for this policy and for equal opportunities and discrimination law compliance in the workplace and [Sean Guthrie](#) has been appointed as the person with day-to-day operational responsibility for these matters.

All Staff have personal responsibility to ensure compliance with this policy, to treat colleagues with dignity at all times and not to discriminate against or harass colleagues, visitors, clients, customers, suppliers and former staff members. In addition, Staff who take part in management, recruitment, selection, promotion, training and other aspects of career development (referred to as Managers) have special responsibility for leading by example and ensuring compliance.

Managers will receive appropriate training in equal opportunities and must take all necessary steps to:

- promote the objective of equal opportunities and the values set out in this policy;
- ensure that their own behaviour and that of their team they manage complies in full with this policy;
- ensure that any complaints of discrimination, victimisation or harassment (including against themselves) are dealt with appropriately and are not suppressed or disregarded;
- include objectives relating to fair and inclusive practices in all employees' performance reviews throughout the year.

Behaviour, actions or words that transgress the policy will not be tolerated and will be dealt with in line with the company's disciplinary policy.

DIGNITY AT WORK

The Grove Media Limited is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect. Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

DEFINITIONS

DISCRIMINATION

Discrimination occurs in different ways, some more obvious than others. Discrimination on the grounds of any of the Protected Characteristics is prohibited by law, even if unintentional, unless a particular exception applies.

DISABILITY DISCRIMINATION

This could be direct or indirect discrimination, and is any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

DISABLED PERSONS

Any Staff member who considers that they may have a disability is strongly encouraged to speak with [Sean Guthrie](#), particularly if they experience difficulties at work because of their disability so that any reasonable adjustments to help overcome or minimise difficulties can be discussed. For these purposes, disability includes any physical or mental impairment which substantially affects your ability to perform day to day activities and has lasted (or is likely to last) more than 12 months. Disclosure of this information will be treated in confidence, if you wish it to be, so far as is reasonably practicable and we will do our best to handle matters sensitively and to ensure that you are treated with dignity and with respect for your privacy.

We will consult with you about whether adjustments are needed to avoid you being disadvantaged and may ask you to see a doctor appointed by us, to advise on this. We will seek to accommodate your needs within reason. If we consider a particular adjustment unreasonable we will explain why and try to find an alternative solution.

Managers with responsibility for managing Staff who they know or think to be disabled should speak to [Sean Guthrie](#) to ensure that all relevant duties are complied with.

HARASSMENT

Harassment is:

- unwanted conduct which is related to a Protected Characteristic and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them; or
- unwanted conduct which is of a sexual nature and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them (Sexual Harassment); or
- less favourable treatment because of the rejection of or the submission to Sexual Harassment.

Harassment can arise in some cases even though the person complaining does not actually possess a Protected Characteristic but is perceived to have it (for example, when a person is harassed because they are (wrongly) believed to be homosexual) or associates with other people who possess a Protected Characteristic (for example, because they have a spouse who is Muslim).

Harassment may include:

- use of insults or slurs based on a Protected Characteristic or of a sexual nature or other
- verbal abuse or derogatory, offensive or stereotyping jokes or remarks;
- physical or verbal abuse, threatening or intimidating behaviour because of a Protected Characteristic or behaviour of a sexual nature;
- mocking, mimicking or belittling a person's disability, appearance, accent or other personal characteristics;

- unwelcome requests for sexual acts or favours; verbal sexual advances, vulgar, sexual, suggestive or explicit comments or behaviour;
- repeated requests, either explicitly or implicitly, for dates;
- repeated requests for social contact or after it has been made clear that requests are unwelcome;
- comments about body parts or sexual preference;
- displaying or distributing offensive or explicit pictures, items or materials relating to a Protected Characteristic or of a sexual nature;
- shunning or ostracising someone, for example, by deliberately excluding them from conversations or activities;
- 'outing' or threatening to 'out' someone's sexual orientation (i.e. to make it known);
- explicit or implicit suggestions that employment status or progression is related to toleration of, or acquiescence to sexual advances, or other behaviour amounting to harassment.

Other important points to note about harassment:

- a single incident can amount to harassment;
- behaviour that has continued for a long period without complaint can amount to harassment;
- it is not necessary for an individual to intend to harass someone for their behaviour to amount to harassment;
- It is not necessarily for an individual to communicate that behaviour is unwelcome before it amounts to harassment; and
- the onus is on each individual to be certain that their behaviour and conduct is appropriate and is not unwanted and in the case of doubt, you must refrain from such conduct.

VICTIMISATION

Victimisation means treating a person less favourably such as, being denied a training opportunity or a promotion, because they have made a complaint of discrimination or have provided information in connection with a complaint or because they might do one of these things.

BULLYING

Is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Examples of bullying would include picking on someone or setting them up to fail or making threats or comments about someone's job security without good reason.

TRANSGENDER EQUALITY

The Grove Media Limited recognises that transgender employees are not required to inform the organisation of their gender status or gender history. The gender in which an individual chooses to present will always be acknowledged and respected. The company supports transgender employees and can be assured that the disclosure will have no bearing on any progressions/promotions. This extends to individuals who identify as non-binary, i.e. they do not regard their gender identity as exclusively male or female.

The requirement to store proof of identity to confirm the right to work in the UK can be particularly sensitive for a transgender employee whose identification documentation may be in their previous names. The company will always ensure that the employee is made aware of the full range of permissible identification documents and that the process of checking is handled sensitively and with respect for the privacy of the individual.

An employee who is transitioning may wish to be redeployed on a temporary or permanent basis. This may be because: the individual is in a candidate/client-facing role and wishes to avoid having to answer questions about their gender identity; or the role involves particular tasks that will be difficult to undertake if undergoing a particular type of treatment (for example, hormone therapy that causes fatigue). Requests to be redeployed will be discussed with the employee and, where possible, the organisation will seek to accommodate the employee's wishes. This will include agreement on whether or not the redeployment is temporary or permanent.

An employee's gender identity will not have a bearing on any employment decisions or access to benefits, except where permitted by law. For example, an individual who has transitioned but does not have a GRC may be required to disclose their gender history for insurance and pension purposes. In such circumstances, the organisation will handle such information in line with its data protection policy.

NAMES AND PRONOUNS

The company will take all necessary steps to ensure that an employee's change of name is respected. A GRC is not required to enable a transgender person to change their name and the company will never ask an individual if they have a GRC to verify a name change. The company will always respect an employee's chosen pronoun. Consistently addressing a transgender employee by their previous name and/or an inappropriate pronoun may be regarded as harassment and will be dealt with accordingly.

It is an employee's decision whether or not to reveal their gender status and the company will respect their right to privacy. The right to privacy will apply regardless of whether or not the individual has a GRC.

COMMUNICATION

Where an employee is transitioning, the organisation will work with the employee to agree what information needs to be conveyed to colleagues and when this should happen. While the whole workforce may not need to know about the employee's transition, people who work closely with the individual will normally need to know to ensure that a good working relationship is maintained.

SINGLE-SEX TOILETS AND FACILITIES

The company will support a transgender employee's right to use the toilets and facilities appropriate to their gender from the point at which the individual declares that they are living their life fully in that gender. In some cases, the individual may wish to use a single-occupancy toilet during their transition, but they must not be pressurised to do so and this

should not be seen as a long-term solution. A transgender person should not be expected to use an accessible toilet unless they prefer to do so.

MAKING EMPLOYMENT DECISIONS FAIRLY

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.

As noted above, the Company will recruit staff and make other employment decisions concerning promotion, training, dismissal and related issues on the basis of objective criteria.

The Company is legally required to verify that all employees have the right to work in the UK. Prior to starting employment, all employees must produce original documents to the Company's satisfaction, irrespective of nationality. Information about the documents required is available from [Sean Guthrie](#).

All promotion decisions will be made on the basis of merit and according to proportionate criteria determined by legitimate business need.

Staff diversity at different levels of the organisation will be kept under review to ensure equality of opportunity.

DISCIPLINE AND TERMINATION OF EMPLOYMENT

Any redundancy selection criteria and procedures that are used, or other decisions taken to terminate employment, will be fair and not directly or indirectly discriminatory.

Disciplinary procedures and penalties will be applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Part-time and fixed-term staff will be treated the same as full-time or permanent staff of the same position and enjoy no less favourable terms and conditions (pro-rata, where appropriate), unless different treatment is justified.

WHAT TO DO IF YOU ENCOUNTER DISCRIMINATION

If you believe that you have been the victim of discrimination, you should follow the Company Grievance Procedure in the Staff Handbook.

If you think you are being bullied or harassed, you may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting. You may feel able to approach the person yourself, or with the help of someone else at the organisation. You should tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the company's

Grievance Procedure. You can choose whether to raise your grievance with your manager or with another manager or [Sean Guthrie](#) directly.

All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a fellow worker or official representative of your choice at any meeting dealing with your grievance. You will be kept informed of the general progress of the process of investigation and, subject to data protection requirements, the outcome of any disciplinary proceedings.

The Company will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.

You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.

Every member of Staff has a responsibility to combat discrimination if they encounter it. Staff who observe or are aware of acts that they believe amount to discrimination directed at others are encouraged to report this to their manager, or [Sean Guthrie](#), in line with the Grievance procedure.

NON-COMPLIANCE WITH THE EQUITY AND DIVERSITY POLICY

Any breach of the equality and diversity policy, or failure to comply with this policy will be taken very seriously and is likely to result in disciplinary action against the offender, up to and including immediate dismissal.

Staff should also note that:

- in some cases, they may be personally liable for their acts of discrimination and that legal action may be taken against them directly by the victim of any discrimination; and
- it may be a criminal offence intentionally to harass another employee.

REVIEW OF THIS POLICY

The directors of the company will keep this policy under review on an ongoing basis to reflect changes in the law, demographics and internal business requirements.

The Company encourages employees to comment on this policy and suggest ways in which it might be improved or ask any questions if they are unsure about any part of this policy or how it is applied by contacting [Sean Guthrie](#).