



**EQUAL OPPORTUNITIES
POLICY STATEMENT**

AND

CODE OF PRACTICE

GELDER GROUP

EQUAL OPPORTUNITIES POLICY AND CODE OF PRACTICE

1. INTRODUCTION

The Gelder Group is committed to a comprehensive policy of equal opportunities in employment in which individuals are selected and treated on the basis of their relevant merits and abilities without regard to race, religion, colour, sex, age, national origin, disability or sexual orientation and are given equal opportunities within the company. The aim of this policy is to ensure that no job applicant or employee receives less favourable treatment on grounds not relevant to good employment practice.

2. POLICY STATEMENT

The policy and practice of the company require that all employees are afforded equal opportunities within employment and that entry into employment with the company and progression within employment will be determined only by personal merit and the application of criteria which are related to the duties of each particular position. In all cases, ability to perform the job will be the primary consideration.

All employees have a duty to co-operate to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Employees must not harass or intimidate other employees on the grounds of race or sex, age, disability or sexual orientation and must not victimise or retaliate against employees who make such allegations. Disciplinary action will be taken against any employee who breaches this policy and serious breaches will be treated as gross misconduct.

3. RECRUITMENT AND SELECTION

The company welcomes diversity amongst its employees and seeks to ensure that all candidates for employment are treated fairly, and that selection is based solely on the individual's abilities and qualifications. The recruitment process must result in the selection of the most suitable person for the job having regard to experience and qualifications where necessary. As an employer committed to the principle of equality of opportunity, the company will adhere to the following procedure for recruiting and selecting individuals for all positions:

3.1 *Selection Criteria*

The selection process will be carried out consistently for all jobs at all levels. Selection criteria for all positions will be clearly defined and reflected in the further particulars sent to applicants which will also include details of the company's commitment to equality of opportunity. Job qualifications or requirements which would have the effect of inhibiting applications from members of particular groups, such as those of one sex, persons of a particular marital status or sexual orientation, persons of a particular racial group, persons within a certain age bracket or those with a disability, will not be demanded or imposed except where they are justifiable in terms of the job to be done.

3.2 *Advertising*

Job advertisements will be widely publicised so as to encourage applications from all suitably qualified and experienced people. In order to attract applications from all sections of the community, the company will endeavour to ensure that advertisements are not restricted to areas or publications which would exclude or disproportionately reduce applications from a particular gender, age group or racial group and should avoid prescribing requirements as to marital status or age or requirements which would exclude a particular gender or racial group. All job advertisements placed on behalf of the company will state the company's commitment to equality of opportunity.

3.3 Selection Methods

The selection process will be carried out consistently for all jobs at all levels. All those handling applications and conducting interviews must be aware of the principles of the Sex Discrimination Act, the Race Relations Act, the Disability Discrimination Act, the Employment Equality (Age) Regulations and other relevant legislation. The selection of new employees will be based on job requirements and the individual's suitability and ability to do the job and information sought from candidates will relate only to the qualifications for or requirements of the job.

3.4 Interviews

The staff responsible for shortlisting, interviewing and making or recommending an appointment will be clearly informed of the selection criteria and the need for consistency. Wherever possible, at least two people will interview applicants and all questions will relate to the selection criteria.

No questions will be based on age, assumptions about roles in the home and the family or the assumed suitability of different ethnic groups for the post in question. Where it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves irregular hours or extensive travel) this will be discussed objectively and will be asked equally of all candidates. In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (such as accessible interview rooms or the assistance of a sign interpreter) should be offered to enable candidates to compete on an equal basis.

4. TRAINING AND PROMOTION

All steps will be taken to ensure equal access to opportunities for training and promotion.

4.1 To help meet the objectives of this policy the company will provide training that:

4.1.1 increases awareness of the prevalence of and harmfulness of discrimination and prejudice on the grounds of age, race and sex, and the needs and abilities of people with disabilities or other disadvantages;

4.1.2 examines the nature of discrimination, both direct and indirect, and the ways in which it can occur and can be prevented;

4.1.3 assists managers and employees to behave in ways that are non-discriminatory; and

4.1.4 explains the operation of and access to grievance and disciplinary procedures.

4.2 When considering candidates for promotion, care will be taken to consider those from all races, age groups and both sexes and those with disabilities where general ability is the main requirement.

5. CULTURAL AND RELIGIOUS NEEDS

Gelder Ltd will endeavour to take measures to ensure that existing policies and procedures are modified to accommodate any particular cultural and religious needs of employees which may conflict with existing work requirements, wherever such measures are compatible with the safe and efficient running of the Company and its service.

6. GRIEVANCE PROCEDURES

6.1 All allegations of sex or racial discrimination or discrimination on the grounds of disability, age or sexual orientation will be dealt with seriously and confidentially.

6.2 Direct discrimination and instances of sexual, racial or other harassment will be treated as disciplinary offences and will be dealt with under the disciplinary procedure.

6.3 An employee who has in good faith taken action under the Race Relations Act or Sex Discrimination Act or complains about racial, sexual or other abuse and/or discrimination, shall not for that reason receive less favourable treatment than any other employee, for example by being subjected to disciplinary action.

6.4 Particular care will be taken to deal effectively with all complaints of discrimination, victimisation or harassment

- 6.5** All employees have the right to seek redress for their grievances and Gelder Ltd will ensure that this right is known.
- 6.6** Complaints by employees will normally be processed through the agreed grievance procedure. It is recognised, however, that employees may find it difficult to approach their immediate manager in cases involving discrimination or harassment. The first point of contact in incidents of this nature may therefore be Tony Banks. If the employee remains aggrieved, then the formal procedure shall be followed.

7. MONITORING AND RECORD KEEPING

Details of candidates and of selection decisions (including the rationale for selection or rejection) will be kept for at least six months after an appointment has been made in case they are required as evidence by an employment tribunal or for other proceedings. The company will keep records of the sex, ethnic group, age and any disability of its employees and of all candidates and of those shortlisted and appointed. Records may be used to determine whether members of one sex or persons of a certain racial group or age bracket or those with a disability do not apply for employment or apply in smaller numbers than might be expected or are shortlisted or appointed in a lower proportion than their application rate or are concentrated in certain jobs. The company will investigate the practicalities of monitoring progression within employment, including access to training and development, promotion and grading.

8. REVIEW OF RECRUITMENT PRACTICE

Recruitment procedures and practices will be kept under review so as to ensure that this policy is being adhered to and to ensure that they do not include requirements or conditions which constitute, or may lead to, unlawful discrimination.

EQUAL OPPORTUNITIES

CODE OF PRACTICE

CONTENTS

1. **Who is responsible?**
2. **Monitoring the Progress**
3. **Recruitment and Selection**
4. **Current Workforce**
5. **Reports**
6. **Equal Opportunities and the Law**
 - 6.1 *Sex Discrimination Act 1975 (amended 1986) and Equal Pay Act 1970 (amended 2003)*
 - 6.2 *Race Relations Act 1976, 2000 and 2003*
 - 6.3 *Rehabilitation of Offenders Act 1974 and (Exceptions) Order 1975*
 - 6.4 *Disability Discrimination Act 1995 (Amendment) Regulations 2003*
 - 6.5 *The Employment Equality (Religion or Belief) Regulations 2003*
 - 6.6 *The Employment Equality (Sexual Orientation) Regulations 2003*
 - 6.7 *Age Discrimination Act 2006*
 - 6.8 *Codes of Practice*
7. **What is Discrimination**
 - 7.1 *Direct Discrimination*
 - 7.2 *Indirect Discrimination*
 - 7.3 *Institutional Discrimination*
 - 7.4 *Victimisation*
8. **Good Employment Practices**
 - 8.1 *Recruitment & Selection*
 - 8.2 *Job Description*
 - 8.3 *Promotion & Transfer*
 - 8.4 *Job Advertisements*
 - 8.5 *Interviewing*
9. **The Selection Process**
 - 9.1 *Late Application*
 - 9.2 *Incomplete Application Form*
 - 9.3 *Essential Requirements*
10. **Part Time**
11. **Maternity**
12. **Contract of Employment**
13. **Job Opportunities for People with Disabilities**
14. **Training**
15. **Disciplinary Procedure**
16. **Grievance Procedure**

EQUAL OPPORTUNITIES CODE OF PRACTICE

1. **Putting the policy into practice - Who is Responsible?**

Gelder Ltd has a primary, legal and moral responsibility for ensuring that discrimination in employment does not occur. The responsibility for promoting equal opportunities rests with Steve Gelder and the Management Team. The Directors are also responsible for ensuring that resources are allocated as appropriate in order to achieve the aim of the Equal Opportunities Policy.

Steve Gelder has overall responsibility for the Policy. Responsibility for implementation of the policy in individual departments and on sites lies with Russell Cunliffe and the appropriate department heads and site managers.

Individual employees at all levels have certain responsibilities. Good practice in terms of service provision, good employee relations and fair employment practices depend on staff as well as on the Company. In particular all employees are expected:

1. To co-operate with measures introduced by Gelder Ltd to ensure equal opportunity and non-discrimination
2. Not to harass, abuse or intimidate other employees or potential employees, clients, suppliers or sub-contractors
3. Not to induce or attempt to induce other employees or management to practice unlawful discrimination.
4. Not to victimise or attempt to victimise individuals on the grounds that they have made complaints or provided information on discrimination.
5. To draw the attention of management to suspected discriminatory acts or practices
6. At all time to carry out their duties with due regard to Gelder Ltd's Equal Opportunities Policy.

2. **Monitoring the Progress of Equal Opportunities**

It is important that the Equal Opportunities Policy is properly monitored to measure the effectiveness of the Policy and to ensure that it is properly implemented.

3. **Recruitment and Selection**

Information will be collected on job applicants and their success rates by ethnic origin, sex and disability. This information will be used to assess the company's success in attracting applications from and appointing members of groups under-represented in our workforce.

It is the responsibility of Russell Cunliffe to ensure that the recruitment process is adequately monitored.

4. **Current Workforce**

Gelder Ltd recognises that in order to progress its Equal Opportunities Policy, a breakdown of current employees by ethnic origin, sex and disability is necessary. The profile of the workforce will enable the company to identify areas where action is needed to ensure that the Equal Opportunities Policy is being supplemented.

Any information gathered under this exercise will be confidential and used solely to develop action to promote Equal Opportunities.

5. **Reports**

The report will address itself to the following questions:

Is there evidence that individuals from any group covered by the Equal Opportunities Policy:

- a) do not apply for employment or promotion, or that fewer apply than might be expected?
- b) are not recruited or promoted at all, or are appointed in a significantly lower proportion than their rate of application?
- c) are under represented in training or in jobs carrying higher pay status or authority?
- d) are concentrated in certain sections or departments?

It is the responsibility of all managers and supervisors to provide information for the annual monitoring reports; to ensure that recommendations are implemented and to report on subsequent progress.

6. Equal Opportunities Legislation

Gelder's Equal Opportunities Policy will be implemented in accordance with the statutory requirements as laid down in the following legislation:

6.1 Sex Discrimination Act 1975 (amended 1986) and Equal Pay Act 1970 (amended 2003)

These Acts require that employers do not discriminate either directly or indirectly, between men or women, or married or unmarried people, in recruitment or in any other way in their treatment of employees. Equal treatment in respect of pay and terms of contract of employment must be given to men and women doing the same or broadly similar work or work which is of a similar value. The Sex Discrimination Act also gives individuals a right of direct access to industrial tribunals for legal remedies for unlawful discrimination, and established the Equal Opportunities Commission to help enforce the legislation and promote equal opportunities and provide information and advice.

6.2 Race Relations Act 1976, 2000 and 2003

This Act makes it unlawful to discriminate against a person, either directly or indirectly, in the field of employment on the grounds of colour, race, nationality or ethnic or national origins. The Act gives individuals a right of access to industrial tribunals for legal remedies for unlawful discrimination in employment. The Act established the Commission for Racial Equality to promote equal opportunities and provide information and advice and gave the Commission powers of investigation and enforcement.

6.3 Rehabilitation of Offenders Act 1974 and (Exceptions) Order 1975

The aim of this Act is to make working life easier for those who have been convicted of a criminal offence. An ex-offender, after a period of rehabilitation, has no need to disclose a previous conviction unless his or her sentence exceeded 2.5 years of imprisonment. Once a conviction becomes 'spent' an employer cannot refuse to employ, dismiss or otherwise discriminate against an ex-offender on the grounds of a previous conviction.

6.4 Disability Discrimination Act 1995 (Amendment) Regulations 2003

The Disability Discrimination Act 1995 makes discrimination against disabled people unlawful, both in respect of employment, recruitment, education, and access to goods, facilities, services and premises.

A disabled person is – anyone who has a “physical or mental impairment which has a substantial and long term adverse effect on his/her ability to carry out normal day to day activities”

Employers have a duty to make reasonable adjustments to accommodate people with disabilities in order to help overcome the practical effects of their disabilities.

6.5 The Employment Equality (Religion or Belief) Regulations 2003

The Employment Equality (Religion or Belief) Regulations 2003 makes it unlawful to discriminate on grounds of religion or belief in employment and vocational training. This includes direct discrimination, indirect discrimination, victimisation and harassment. The definition is any religion, religious belief or similar philosophical belief.

The legislation in 3.7 and 3.8 means that the company must treat everyone fairly regardless of sexual orientation, religion or belief in employment practices and training.

6.6 The Employment Equality (Sexual Orientation) Regulations 2003

The Regulations makes it unlawful to discriminate on grounds of sexual orientation in employment and vocational training.

This includes direct discrimination, indirect discrimination, victimisation and harassment. The definition is orientation towards the same sex, the opposite sex or both sexes but excludes sexual practices.

6.7 The Employment Equality (Age) Regulations 2006.

These Regulations prohibit discrimination, harassment and victimisation on the grounds of age, in employment and the provision of vocational training. This applies to all workers, whatever their age. Employers are allowed to set a default retirement age (usually 65) but employees have the right to request to work longer.

The spirit of all this legislation is to seek to remove social injustices.

These laws are designed to provide redress for those who consider they are discriminated against by reason of sex, marital status, ethnic or national origin, colour, race, nationality, age, disability and differing terms of employment, including pay for jobs of equal value.

In employment, these acts make it unlawful for employers to discriminate on any of these grounds. Legal action can be taken against employers who demonstrate unfair discriminatory practices.

The laws are administered by:

- Equal Opportunities Commission (EOC)
- Commission for Racial Equality (CRE)
- Disability Rights Commission (DRC)

These bodies issue codes of good practice on promoting equal opportunities and provide assistance to individuals on how to redress grievances.

6.8 Codes of Practice

Full account must be taken of all available guidance including the following Codes of Practice:

- Commission for Racial Equality Code of Practice for the elimination of racial discrimination and the promotion of equality of opportunity in employment.
- Equal Opportunities Commission Code of Practice for the elimination of sex and marriage discrimination and the promotion of equality of opportunity in employment
- Manpower Services Commission Code of good practice on the Employment of Disabled People

7. What is Discrimination?

7.1 Direct Discrimination

Takes place when a person or group of people is treated less favourably than other people in the same or similar circumstances. For example, choosing not to employ somebody who meets the requirements for the job because they are black, or married with children, or because they have a disability, or because they are gay or lesbian, or over 55, would all constitute direct discrimination.

7.2 Indirect Discrimination

Takes place when a requirement or condition has the effect of discriminating unfairly and unjustifiably between one group or individual and another. This can be quite unintentional.

However, particular attention must be taken to avoiding this form of discrimination since it tends to occur more readily and frequently than direct discrimination. For example, standard entry qualifications applied automatically across a wide range of jobs, may lead to a situation where applicants are asked to meet requirements which are not actually relevant to the needs of the job. Insisting on higher language standards than are necessary for safe and effective job performance would tend to disqualify people for whom English is not their first language at a higher rate than others. Insisting on an unnecessary physical requirement could discriminate against one sex in favour of another and so on.

7.3 Institutional Discrimination

This takes place when established policies, practices and procedures within an organisation have discriminatory effects, whether intentional or not.

It is important to note that when considering discrimination on the grounds of race or sex, the terms direct discrimination and indirect discrimination have legal force. Therefore in addition to being against Gelder Ltd's policy it would also be illegal to discriminate on these grounds.

7.4 *Victimisation*

Discrimination by victimisation is unlawful. A person is victimised, for example, if he or she is given less favourable treatment than others in the same circumstances because it is suspected or known that he or she has brought legal proceedings against an employer or given evidence or information relating to such proceedings, or alleged that discrimination has occurred.

8. *Good Employment practices*

This section of the Code sets out how consistent and justifiable criteria should be established and used for decisions in selection, training, promotion, redundancy, grievances and career development. Without consistency, decisions can leave the way open for discrimination to occur.

8.1 *Recruitment and Selection*

All members of staff who have the authority to recruit and/ or are involved in the recruitment process must be trained in recruitment and selection and in the provisions of the relevant legislation, in particular the Race Relations Act 1976 and the Sex Discrimination Act 1975. It is recognised that it will take some time to achieve this. In the meantime at least one member of Gelder will have been trained.

8.2 *Job Description*

Every job must have a job description written in a clear and concise manner. When a job becomes vacant, any existing job description must be reviewed to ensure that it is still relevant to the post. Job descriptions should be drawn up by the relevant manager with Russell Cunliffe.

Job descriptions should follow the standard format and must comply with the Equal Opportunities Policy. Each job description should include the following clause;

“At all times the employee must carry out his/her responsibilities with due regard to the Gelder Ltd’s Equal Opportunities Policy”

Any Health and Safety requirements must be clearly stated on the job description.

Any skills and abilities specified when advertising a position within the company should be strictly relevant to the requirements of the job.

All stated requirements must be clearly justifiable in terms of the principal functions of the post. For example, care should be taken to avoid the following: requiring specific qualifications rather than ability to do the job; using criteria such as age to determine responsibility; including too many references to ‘preferred’ criteria rather than criteria which are essential to the requirements of the job.

Consideration should be given to the use of a Genuine Occupational Qualification as one of the essential criteria for the job, where applicable.

The following clause is to be included in all person specifications for posts which involve management and supervisory responsibilities.

“The postholder must have the ability to understand and implement the Equal Opportunities Policy at a level appropriate to the job”

8.3 *Promotion and Transfer*

While the practice will usually be to advertise jobs externally as well as internally, as part of Gelder Ltd’s commitment to the career development of its staff consideration may be given to internal recruitment from existing employees. In making the decision not to advertise externally, consideration must be given to whether the pool of potential applicants is representative in terms of race or sex. It must be remembered that internal promotion alone can be indirectly discriminatory where this is not the case.

When selecting internally, care should be taken not to perpetuate any past discriminatory practices. A job description and person specification should be drawn up in all cases.

Opportunities for promotion and transfer should usually be advertised throughout Gelder to ensure that all potential candidates are made aware of the opportunities. This means that a move into a higher grade depends on the candidate's ability to satisfy the selection panel that he/she is equipped to perform that job. Unsuccessful candidates for promotion or transfer should be given reasons for the decision, so that they can improve their future chances.

8.4 Job Advertisements

Vacancies at all levels should be advertised. Exceptions will be made in the case of redeployment of staff who would otherwise be made redundant and where Gelder has obligations to employ trainees upon completion of a training post.

Employment opportunities should be made available to the widest range of applicants, and advertisements must not restrict unnecessarily the field of applicants. Advertisements should be placed internally and externally.

Care must be taken that the wording of the advertisement allows a wide cross-section of the population to apply and that only essential criteria are mentioned in the advertisement.

In assessing an application from a candidate who has a disability, further advice must be sought as to the nature of the disability and the availability of aids to employment or adaptation of buildings, if there is doubt as to the candidate's suitability for the job because of the disability.

In order to avoid allegations of favouritism, no one connected by close friendship or blood to an applicant should be involved in the selection process.

8.5 Interviewing

Interviewers must keep adequate notes of the interview including reasons for selection or nonselection, using the interview record sheet.

Interview questions must be related to the requirements and circumstances of the job and must not be of a discriminatory nature. For example, candidates should not be asked questions about their ethnic origin or that of their family or how they would react to a supervisor of a different race or sex.

In the interview, candidates from black and ethnic groups should not be asked questions which could be seen as directly or indirectly discriminatory, e.g. questions which test their understanding of UK customs. Neither should their fluency in English be used as a selection criteria unless this is a bona fide requirement of the job.

Where a job involves unsociable or irregular hours or travel the full facts should be presented to all applicants before the interview. The interviewers should establish by a simple question whether or not the candidates have understood the requirements of the job.

Candidates should be asked appropriate questions to establish whether they understand the implication of the Equal Opportunities Policy for their job. A candidate's expressed opposition to the operation of the Equal Opportunities Policy must be taken as grounds for non-selection.

Selection decisions must not be influenced by factors such as the race or sex profile of the previous postholder or by any colleague's unwillingness to work with members of a particular group.

Informal visits should not be seen as part of the formal selection process. They are simply to provide opportunity for the candidate to obtain general information about Gelder Ltd / the department.

If any member of an interview panel feels that discrimination has occurred in the selection process, the matter must be reported immediately to Russell Cunliffe. No decision should be made until the issue is resolved.

9. The Selection Process

The aim of the selection process is to appoint the most suitable applicant to the post by following a clearly defined and fair procedure. The selection decision is at all times based on individual merit and the necessary attributes for the post. Reasons for not shortlisting or not appointing applicants may include the following.

9.1 Late Application

A late application will be a genuine reason for not shortlisting a candidate. Applications must be received by the closing date stipulated in the advertisement. Only in exceptional circumstances will a late application be considered.

9.2 Incomplete Application Form

An incomplete application form is one where the information provided by the candidate is insufficient to make decision as to the suitability of the candidate on the basis of the criteria stated in the person specification. Internal candidates must be treated similarly.

9.3 Inability to Satisfy the Essential Requirements

Inability to satisfy the essential requirements of a post is a valid reason for not shortlisting a candidate, where readily identified by the application form. Records should show which of the essential requirements a candidate failed to satisfy. All essential requirements must be clearly stated in the person specification.

If an unsuccessful candidate asks for reasons why he/she did not get the job, this information should be provided by the relevant manager

Internal candidates should always be given the reasons for non-shortlisting or nonappointment, since this will be of use to their personal/career development

10. Part Time

The employment of part time staff should be encouraged as it can make a valuable contribution to the running of the company, in addition to providing employment opportunities to groups who are often disadvantaged in employment terms. Part time employment may enable highly qualified and competent staff to return to employment after a career break.

Part time staff should have equal access to training and career development and should not be expected to undertake all the dull, menial or unpleasant tasks for their full time colleagues

11. Maternity

Gelder Ltd is aware of the provisions for maternity leave which state that consent will not be unreasonably refused to women on maternity leave to return to work. It should be remembered that the refusal to allow women to return to work part time or job sharing after maternity leave, except where it is impracticable, can constitute sex discrimination.

12. Contract of Employment

The following condition should be incorporated into the written terms and conditions of employment of all staff:

- a) You must at all times carry out your duties with due regard to the Company's Equal Opportunities Policy
- b) Managers shall not discriminate against any particular member of staff or group of staff in selection for redeployment or voluntary redundancy. All cases of redeployment or voluntary redundancy shall be carried out in a fair and consistent manner
- c) Selection criteria for redeployment or voluntary redundancy shall be examined to ensure that they are not discriminatory, either directly or indirectly

13. Promoting Job Opportunities for people with Disabilities

Gelder's wish to provide good employment opportunities to people with disabilities and to ensure that no employees or job applicant is unnecessarily discriminated against on the grounds of disability.

Gelder Ltd has a commitment to retrain in suitable employment any employee who becomes disabled

Employees with disabilities have equal access with able-bodied employees to all training promotion opportunities

Gelder is committed to ensuring that facilities are suitable for the employment of people with disabilities and every effort will be made to provide any necessary adaptations or new equipment and training in their use.

14. Training

Training and guidance will be provided and regularly reviewed for all managers in key decision making areas to ensure that they fully understand the Equal Opportunities Policy. This training and guidance is particularly relevant for those managers who make decisions on issues relating to recruitment, promotion, transfer, training, dismissal, appraisal, terms of employment, grievances and disciplinary procedures.

The content of all training courses and any materials will be regularly reviewed to ensure that they promote Equal Opportunities and race equality. This is of particular relevance to Induction Courses.

The selection criteria for training opportunities will be reviewed regularly to ensure that they do not discriminate either directly or indirectly

All staff should be made aware by their immediate manager of the career and training opportunities available to them, so that no group of employees are disadvantaged.

15. Disciplinary Procedure

In applying the disciplinary procedure, care must be taken to ensure one particular person is not disciplined for performance or behaviour which would be overlooked or condoned in other employees

In applying the Disciplinary Procedure, consideration should be given to the possible effect on employees' behaviour of racial or sexual abuse or harassment.

16. Grievance Procedure

Particular care must be taken to deal effectively with all complaints of discrimination, harassment or victimisation. It should not be assumed that such complaints are made by those who are over-sensitive.

Particular care must be taken to make sure that an employee who has taken action in good faith under the Race Relations Act, Sex Discrimination Act or other aspects of the Equal Opportunities Policy does not receive less favourable treatment than other employees.

It is recognised that employees may find it difficult to approach their immediate superiors in cases involving discrimination and harassment. The first point of contact in such instances will be the health and safety /training manager – Tony Banks