

## EQUAL OPPORTUNITIES/HARASSMENT POLICY STATEMENT

Butler & Young Associates aim to ensure that all individuals are treated equally and fairly and to provide a harassment free working environment.

The overall responsibility for implementing this policy is with the Directors, and the HSQE Manager is responsible for making staff aware of the policy.

In order to ensure our general statement is achieved, the following will form the Company aims and objectives.

1. It is unlawful to discriminate directly or indirectly in recruitment or employment because of the nine "Protected Characteristics" in the Equality Act 2010. These are: Age, Disability, Gender reassignment, Marriage & civil partnership, Pregnancy & maternity, Race, Religion or belief, Sex and Sexual orientation.

Butler & Young Associates will take positive measures in respect of job applicants and employees to ensure that there is no discrimination, either indirect, overt or unintentional, in respect of conditions of service, personnel policies and procedures, etc. on the grounds of the above characteristics. This will be mentioned in job advertisements and discussed with the employee as part of their induction when joining the company.

2. It is unlawful for staff to discriminate directly or indirectly, or harass customers or clients because of the "Protected Characteristics" in the Equality Act 2010. These are: Disability, Gender reassignment, Pregnancy & maternity, Race, Religion or belief, Sex, Sexual orientation.

Butler & Young Associates will maintain a harassment free workplace for all employees and third parties (clients, customers) and any victimisation, discrimination or harassment will be treated as a disciplinary offence. We also include Age within this, although it is not yet covered by the Act.

3. Butler & Young Associates recognises that it is good business practice to positively encourage the breakdown of barriers which exist where one group predominates, although selection of candidates or employees for appointment, promotion and training will always be based on the merit and qualifications of the individual.
4. Butler & Young Associates will ensure that there is no discrimination against Associative discrimination - is where an individual is directly or indirectly discriminated against or harassed for association with another individual who has a Protected Characteristic
5. Butler & Young Associates will ensure that there is no discrimination against Perceptive discrimination - is where an individual is directly or indirectly discriminated against or harassed based on a perception the he/she has a particular Protected Characteristic when he/she does not.
6. Butler & Young Associates recognises that an equal opportunities policy requires regular reinforcement and monitoring of its effectiveness and, therefore:
  - a. We will ensure that all personnel policies and procedures are regularly updated in the light of their practical application and that these policies and procedures include references to equal opportunities.
  - b. We will ensure regular consultation with staff to review progress and amendments to policy and procedures.

- c. We will ensure that all staff have their own copy of this Policy, and all new staff are given a copy as part of their induction to the company.
- d. We will regularly monitor the ethnic records of job applicants and existing employees.
- e. They will ensure that direct or indirect victimisation, discrimination or harassment does not occur during recruitment and other employment decisions.
- f. We will ensure that victimisation (such as being denied a training opportunity or a promotion) does not occur if an employee has made or supported a complaint or raised a grievance under the Equality Act 2010

### What is Harassment?

Harassment may involve action or inaction, behaviour, exclusion, comment or physical contact that the recipient finds objectionable or offensive. Harassment is unwanted conduct: it could be of a sexual nature, or it could result from the rejection of or submission to unwanted conduct. It may result in the recipient feeling threatened, humiliated, intimidated, patronised, demoralised or less confident in their ability. Condoning such conduct may be harassment in itself. The test of harassment is, at least in part, subjective.

Harassment can be directed towards a person on the grounds referenced above, or in relation to someone they are associated with, despite them not having that characteristic themselves. Harassment can also be directed towards an individual if they are perceived to have one of these characteristics, even if they do not possess it.

Examples of unacceptable conduct include (these examples are not an exhaustive list):

- verbal abuse, or insulting behaviour;
- jokes about an individual's protected characteristic, or about an individual's physical or mental attributes;
- the display or circulation of sexually suggestive, or racially abusive material;
- Bullying including persistent inappropriate criticism and personal abuse and/or ridicule, coercive or threatening behaviour either in public or private, which humiliates or demeans those involved;
- the ridicule or exclusion of an individual for cultural or religious differences, on the grounds of sex or sexual orientation or on the grounds of disability;
- unsolicited or unwelcome sexual advances, including touching, staring or commenting;
- repeated suggestions for unwanted social activities; and
- comments of a sexual nature about a person's appearance or dress.

Butler & Young Associates will not tolerate any departure from these rules and will take the appropriate disciplinary action in the event of any infringement.



SIGNED

M Wetton, Director

DATED 17 June 2024