

## ETHICAL EMPLOYMENT POLICY

Rapleys LLP (Incorporating Rapleys Consultants Ltd) is an equal opportunity employer and is fully committed to a policy of treating all of its employees and job applicants equally.

The LLP will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

The LLP will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

The LLP will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the LLP.

Rapleys carries out thorough identity checks on all new employees, ensuring that the LLP is complying with its obligations for legality of employment (work permits, underage working etc), and the Rehabilitation of Offenders Act 1974.

Employees have a duty to co-operate with the LLP to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the LLP's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

Employees must draw the attention of their line manager to suspected discriminatory acts or practices or suspected cases of harassment. It is not permissible to victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the LLP's disciplinary procedure.

## RECRUITMENT, ADVERTISING AND SELECTION

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. The LLP is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.

With disabled job applicants, the LLP will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to work premises in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

## TRAINING AND PROMOTION

Where a promotional system is in operation, it will not be discriminatory, and it will be checked from time to time to assess how it is working in practice.

## TERMS OF EMPLOYMENT, BENEFITS, FACILITIES AND SERVICES

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

## EQUAL PAY

The LLP is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. Rapleys LLP is also a Living Wage Employer.

## BULLYING AND HARASSMENT

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.

Harassment occurs where, on the ground of an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability, a person engages in unwanted conduct that:

- has the purpose of violating the employee's dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee; or
- is reasonably considered by the employee to have the effect of violating his or her dignity at work, or of creating an intimidating, hostile, degrading, humiliating or offensive work environment for the employee, even if this effect was not intended by the person responsible for the conduct.

Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "office banter" may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Harassment also occurs where, on the ground of the employee's rejection of or submission to unwanted conduct of the kind specified above, a person treats the employee less favourably than he or she would treat him or her had he or she not rejected, or submitted to, the unwanted conduct.

### Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature
- subjection to obscene or other sexually suggestive or racist comments or gestures
- the offer of rewards for going along with sexual advances or threats for rejecting sexual advances
- jokes or pictures of a sexual or racial nature

- demeaning comments about an employee’s appearance
- questions about a person’s sex life
- the use of nick names related to an employee’s sex, sexual orientation, gender reassignment, race, religion, age or disability
- picking on or ridiculing an employee
- isolating an employee or excluding him or her from social activities or relevant work-related matters.

## REPORTING COMPLAINTS

All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. The LLP will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation or age or from employees who have undergone gender reassignment, are married, have entered into a civil partnership or have a disability.

With cases of harassment, while the LLP encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the LLP also recognises that actual or perceived power and status disparities may make such confrontation impractical.

Complaints of discrimination or harassment should follow the Grievance Procedure.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the LLP’s disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the LLP’s disciplinary procedure.

## MONITORING EQUAL OPPORTUNITY AND DIGNITY AT WORK

The LLP will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, the LLP will implement them. The LLP will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

## COMPLIANCE CONFIRMATION

Please take the time to read the Ethical Employment Policy and if you have any queries or concerns, please contact the HR Team. Please confirm that you have read and understood the Ethical Employment Policy by signing and returning at your earliest opportunity.

A copy of this will be retained on your personnel file.

I confirm I have read and understood the Ethical Employment Policy.

Name:	
Date:	
Signed:	