

Human Rights Equality, Diversity and Inclusion Policy

Human Rights

Restore Harrow Green is committed to developing an organisational culture which implements a policy of support for the internationally recognised human rights contained within the Universal Declaration of Human Rights, and seeks to avoid complicity in human rights abuses.

Our commitment to the realisation of human rights is embedded in the Group's social policies. Key human rights issues are embedded in internal risk assessment processes and guidelines, as well as being addressed explicitly in documents such as the Supplier Code of Conduct and Ethical Procurement Policy.

Restore Harrow Green seeks to improve its human rights performance by referencing key documents such as the United Nations Guiding Principles on Business and Human Rights, and relevant conventions and standards of the International Labour Organisation, as well as other international standards, national and international laws.

Restore Harrow Green is committed to taking part in activities designed to promote the corporate responsibility to respect human rights.

Equality Statement

Restore Harrow Green is committed to the principle of equal opportunity in employment and will not tolerate unfair discrimination of any kind and as specified in the Equality Act 2010. Restore Harrow Green believes and recognises that the diversity of the communities we operate in is a huge asset that should be valued and seen as one of the company's strengths. As the leaders in our field we are committed to providing quality of opportunity and tackling discrimination, harassment, victimisation, intimidation and disadvantage.

We are also committed to achieving the highest standards in service delivery and customer satisfaction. Equality of opportunity for all sections of the workforce is integral to this commitment. In driving this policy forward, we will make this statement available to everyone that works for Restore Harrow Green, anyone that applies to Restore Harrow Green and any of our contractors or organisations that partner with Restore Harrow Green.

We will also monitor all areas of disciplinary and grievance outcomes to ensure these actions are not disproportionately affecting any specific group of employees. Restore Harrow Green will deal with any unfavourable treatment effectively and consistently.

Restore Harrow Green's Equality Policy applies equally to workers and employees and the word "employee" is used generically to define both employees and workers.

Our employment policies for recruitment, selection, training, development promotion and retention are based on three

principles:

Equality - we promote equality of opportunity by seeking to remove barriers, eliminating discrimination and ensuring equal opportunity and access for all groups of people.

Diversity –we accept each person as an individual. Our success is built on our ability to embrace diversity – And we believe that everyone should feel valued for their contributions. By working together we will deliver the best possible service for our employees and stakeholders,.

Inclusion: We create a working culture where differences are not merely accepted, but valued; where everyone has the opportunity to develop in a way that is consistent with and adheres to our aims of impartiality, honesty, integrity and objectivity.

Recruitment, selection, training, development promotion and retention policies are designed to ensure that no job applicant or employee receives less favourable treatment on the grounds of race, colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation, marital or civil partnership status, disability, age, pregnancy and maternity, gender reassignment (Protected Characteristics) or part-time or fixed term status.

The Company will ensure that individuals are selected, promoted and treated on the basis of their relevant aptitudes, skills and abilities. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Diversity, Inclusion and Equality in Service Provision

As a market leader in office moving services, Restore Harrow Green is committed to challenging inequality, discrimination and disadvantage. Equality of opportunity for all sections of the community is an integral part of this commitment. We believe and recognize that the diversity of our population is one of our greatest strengths and assets.

We are committed to achieving the highest standard of service delivery and employment practice.

To deliver its commitment, Restore Harrow Green will:

- Promote the development and design of services that are sensitive to the requirements of the diverse customers we serve.
- Encourage equality of opportunity for all people and actively promote good relations.
- Promote and mainstream the implementation of Restore Harrow Greens Equality and Diversity Policy, to ensure that all Directors and Senior Managers take responsibility for addressing equality in all service provision.
- Ensure that equality is taken into account in the additional areas covered by future legislation.
- Achieve greater consistency in our approach to equality in the delivery of all our services with the help of Equality Impact Assessments which assist the identification of any current or potential inequality that may occur.
- Monitor all the different customers who use our services to help identify the specific needs of diverse customers and individuals in relation to the delivery of services.
- Ensure that all employees understand what equality in service provision means.
- Ensure that partners, contractors and suppliers are aware of Restore Harrow Green's commitment to equality in service delivery and agree to provide services that meet this commitment.

- Ensure that customer complaints/queries/comments are dealt with in a fair, sensitive and consistent manner, promoting a climate where people feel comfortable in making suggestions about unfairness, exclusion or discrimination, without fear of victimization or recrimination.

Responsibilities

The Company Management at all levels has the primary responsibility for the effective application of the policy and for ensuring that its policies and procedures comply with discrimination law:

- by not discriminating in the course of employment against fellow employees or job applicants;
- by not inducing or attempting to induce others to practise unlawful discrimination; and
- by bringing to the attention of employees that they will be subject to disciplinary action for failure to adhere to the policy.

Employees have the responsibility to ensure they assist in the implementation of this policy:

- by not discriminating in the course of their employment against fellow employees, customers, suppliers, or members of the public with whom contact is made;
- by not inducing or attempting to induce others to practise unlawful discrimination; and
- by reporting any discriminating action to the Company Management.

Our commitments and expectations in support of this policy are described below . This policy does not form part of any employee's Contract of Employment and may be amended at any time.

Our commitments and expectations:

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- Encouragement of diversity in the workplace is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.
- Breaches of our equality and diversity policy will be regarded as misconduct and could lead to disciplinary proceedings.

To make the policy work requires much more than this formal system. The policy will help to create the necessary conditions for success but it is for each employee to make his or her own contribution.

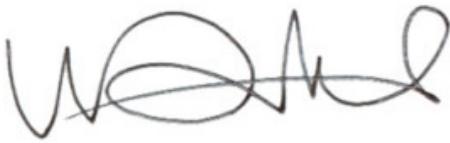
The consistent application and effectiveness of the policy will be regularly monitored and reviewed annually. Overall responsibility for its implementation rests with the Managing Director or nominee.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities.

All members of staff should ensure that they take the time to read and understand the content of this policy and act in accordance with its aims and objectives. All staff must ensure that they are familiar with, comply with and support its policies and procedures.

If an employee considers that he or she is a victim of discrimination he or she may raise the issue through the Grievance Procedure in the Manual.

Signed on behalf of Restore Harrow Green Limited

A handwritten signature in black ink, appearing to read 'Nigel Dews', written in a cursive style.

Nigel Dews – Managing Director

Supporting Processes

1. Recruitment Policy
2. Training Strategy
3. Positive Work Environment Policy
4. Disciplinary and Dismissal Procedure
5. Grievance Procedure
6. Employee Documentation
7. Monitoring

1. RECRUITMENT AND SELECTION POLICY AND PROCEDURE

1.1 POLICY

The recruitment, promotion and other selection decisions are of prime importance as the vehicle for obtaining the best possible person-to-job fit which will, when aggregated, contribute significantly towards Restore Harrow Green's effectiveness. It is also becoming increasingly important as the company evolves and changes, that new recruits show a willingness to learn, adaptability and ability to work as part of a team. The recruitment and selection procedure should help managers to ensure that these criteria are addressed.

The company recruitment and selection policy will:

- be fair and consistent;
- be non-discriminatory on the grounds of Protected Characteristics or part-time or fixed term status; and
- conform to statutory regulations and agreed best practice.

To ensure that these policy aims are achieved, all appointing managers will receive training in effective recruitment and selection.

Our recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

1.2 PROCEDURE

The following procedure should be used when a position is to be filled.

The appointing manager must:

- Define the job. If it is an existing position, is an exact replacement required or is this an opportunity to revise the requirements? If it is newly established, the manager must be clear on the exact requirements, draw up a job description and consult the human resources department in relation to the appropriate salary.
- Complete a job vacancy form which confirms:
 - details of the position;

- final approval from the appropriate director.
- Send the job vacancy form to the human resources department. No vacancy can be processed without this authorisation.
- Ensure the job description and person specification are up-to-date. The human resources department should be contacted for advice or any assistance in completing these.
- Collate an information package appropriate for the position. This package should include:
 - job description and if appropriate, the person specification;
 - information on the department;
 - information on the company;
 - terms and conditions of employment.

It is important that this pack is carefully put together in order to present a professional image of Restore Harrow Green; therefore out of date or poorly presented information must not be used.

•Discuss with the human resources department the most effective means of obtaining suitable candidates. The following options should be explored:

- Internal advert within the company (mandatory except upon board instruction);
- Examination of previous applications, or those held on file within the human resources department;
- External advert within the job centre;
- External advert in the local press;
- External advert in the national press;
- External advert in the appropriate technical or professional journal;
- Use of a recruitment agency.
- Draft the content for the advertisement which should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. The human resources department will check the advertisement for legislative compliance and send to the design and communication department for incorporation into the standard format. All advertisements must contain as much information as possible to ensure the correct recruitment group is targeted and reduce unsuitable applications, while remaining as cost-effective as possible. External adverts will be submitted to the appropriate director or senior manager for approval before being placed.

1.3 THE SELECTION PROCESS

Appropriate selection procedures must be used for each position. Procedures may vary, at its simplest this may involve a straight forward interview and skills testing. For more senior positions psychometric testing, presentations to the interview panel on a chosen topic and/or a series of individual interviews on various topics may be included.

The appointing manager and human resources are responsible for short listing and interviewing. At least two people should be involved in short listing and sit on the interview panel.

The application forms received by the closing date will be forwarded to the appointing managers for short listing. Applicants must be chosen against the person specification. It is the responsibility of the appointing manager at this stage to record (in writing) the reasons why an applicant is not short listed. All papers must be returned to human resources who will invite the candidates for interview, obtain references and make the necessary housekeeping arrangements for the interview. Candidates who have not been short listed will also be informed.

Internal applications should be given due consideration and treated in a fair and equitable way. There is no legal or legislative requirement to interview internal applicants. However, the morale of the employee must be taken into consideration, as they have made the effort to apply. If the appointing manager and human resources department agree that there is no mileage in progressing the application, the human resources department will inform the applicant via e-mail or letter, whichever is most appropriate, inviting the candidate to seek further feedback from the appointing manager.

Before the interview, each panellist will receive an interview pack containing:

- copies of application forms or CVs
- a copy of the job advertisement;
- a copy of the job description;
- a copy of the person specification.

The appointing manager will:

- decide on the interview format and determine which areas to concentrate on with the questioning;
- decide on who will chair the interview panel

At the interview, the appointing manager will ensure that notes are taken as fully as possible. A pre-prepared matrix detailing the required key competencies will help ensure consistency of note taking and the measurement of skills and abilities deemed to be essential to the role (see attached example). When interviewing, the appointing manager will ensure that Equal Opportunities legislation is strictly adhered to.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with human resources approval. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments);
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at assessment or interview; and
- Equal opportunities monitoring (which will not form part of the decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked about past or current pregnancy or future intentions related to pregnancy.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status

should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the Human Resources Department or UK Visas and Immigration.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we may gather data regarding applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information would be voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information would be removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing such data could, in certain circumstances, help us take appropriate steps to avoid discrimination and improve equality and diversity.

When all candidates have been interviewed, the panel will decide on the best person for the position. The appointing manager will arrange to inform the successful candidate as soon as possible, agreeing a commencement date and starting salary.

All interview packs should be returned marked "private and confidential" to the human resources department.

Upon instruction from the appointing manager, the human resources department will:

- telephone or write to all unsuccessful candidates with outcome of interview;
- write to the appointee, offering the position providing satisfactory references are received;
- initiate a personnel file and computer entry for the new member of staff;
- notify the manager if the appointee refuses the offer, or if there are any other details to be cleared.

Unsuccessful internal applicants will be informed of the outcome by the human resources department either via e-mail or letter, whichever is most appropriate with an invitation for the applicant to seek feedback from the appointing manager. The line manager should inform the IT department of the new staff member's requirements by completing an IT new user form.

If an internal applicant is deemed to be the best person for the job the appointing manager should out of courtesy inform the candidate's line manager by telephone or in person, in confidence, and discuss the transfer date which should ideally be no longer than the employee's contractual notice. The appointing manager should inform the successful applicant and instruct the human resources department as above.

The human resources department will arrange, in conjunction with the appointing manager, an individual programme of induction for the new start which will be arranged and agreed at least one week before the appointee commences.

References, once received by the human resources department, will be deemed to be satisfactory or unsatisfactory and the line manager informed.

In exceptional circumstances these procedures may be curtailed or altered in order to meet the overriding needs of the business.

2 TRAINING STRATEGY

Restore Harrow Green is committed to the principle of equal opportunities and to developing the skills of all employees to

enable them to carry out their roles to the best of their ability, in order to fulfil the aims and objectives of the group.

The group has committed to provide training and development for its people and this is reflected in the annual budget set aside each year for this purpose. The budget for training and development is currently equivalent to 2% of the overall wage bill of the organisation.

The principle aim of any staff training and development is to improve the effectiveness of both the individual and the company and to enable the organisation to utilise staff resources flexibly whilst achieving business goals. In addition training and development supports personal growth and improvement.

2.1 RESPONSIBILITIES

Directors

The directors are responsible for approving the overall direction of the group's training and development plan. The board is also responsible for ensuring that appropriate resources are made available and that the training and development policy and annual plan are in line with business objectives.

HR manager

The HR manager is responsible for advising on the content of the training and development policy and annual plan, as well as for ensuring that programmes effectively meet requirements within allocated resources. In addition, responsibilities include providing professional expertise and advice in relation to all training and development matters.

Managers and supervisors

All those responsible for managing and supervising staff have the responsibility for the development of their people. It is the role of all managers to take a structured approach towards meeting the training and development needs of their team within the overall training and development strategy. Supported by HR they have an essential role in: identifying training and development opportunities, meeting team and individual team member needs, ensuring that training undertaken is evaluated and that feedback into the training and development process is provided.

2.2 ACCESS TO TRAINING AND DEVELOPMENT

An annual training plan will be compiled for each division. It will identify needs by referring to the following:

- Business plan;
- Divisional targets;
- Performance appraisal;
- Staff job descriptions and performance standards;
- Recognised professional qualifications;
- Statutory changes in legislation;
- Team meetings.

In addition the following mandatory training will be organised across the whole business.

- Induction for all new staff;

- Health and safety;
- Industry specific awareness;
- First aid.

Management training encompassing the following elements:

It is intended that all managers and supervisors involved in recruitment and selection must attend a recruitment and selection course within their first 12 months of employment, plus an effective use of the grievance and disciplinary procedure and appraisals course within six months. Managers who have attended these courses will be required to update their knowledge at least once every three years.

To access training a staff member must discuss training with their manager and complete a training request form. All training and development requests will be given consideration and training must be booked through HR.

All attendance on training and development events must be authorised by the appropriate line manager. All internal courses will be advertised, details of which can be found within departments or HR.

2.3 CANCELLATIONS

Any costs incurred through unauthorised cancellation of training will be borne by the employee unless the cancellation was due to sickness. Cancellation by reason of sickness must be supported by a doctor's certificate.

2.4 CRITERIA FOR ACCESS TO QUALIFICATIONS TRAINING

The number of staff being approved to undertake external qualification training and development will be limited by: the availability of the budget, the relevance of the proposed activity in terms of their present or forthcoming role, and the future development of the business.

A member of staff wishing to access day release or funding in order to pursue qualifications training must have successfully passed their probationary period.

2.5 EVALUATION

All training and development will be monitored and its success measured using the evaluation process. Evaluative findings and divisional training and development plans will be reported to the main board as part of the human resources monthly board report.

An annual report of training and development will be brought to the attention of the board of directors. It will demonstrate how the training and development provided has met its objectives and contributed to achieving group objectives. It will record lessons learnt for the future and show how the investment in training and development has been realised.

3. POSITIVE WORK ENVIRONMENT POLICY

3.1 STATEMENT OF THE POLICY

The Company is committed to creating a harmonious working environment, which is free from harassment and bullying and in which every employee is treated with respect and dignity.

It is committed to ensuring that individuals do not feel apprehensive because of race, colour, nationality, ethnic or national

origin, religion or belief, sex, sexual orientation, marital or civil partnership status, disability, age, pregnancy and maternity or gender reassignment.

This policy covers harassment or bullying which occurs at work and outside of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, apprentices, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

This policy covers all employees, apprentices, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

Harassment and bullying are unacceptable behaviour at work and will be treated as misconduct, which may include gross misconduct warranting dismissal without notice. All employees must comply with this policy.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

3.2 DEFINITION OF HARASSMENT

Harassment is unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to a Protected Characteristic. Harassment is unacceptable, even if it is not associated with a Protected Characteristic.

Harassment may take many forms. It can range from extreme forms such as violence to less obvious actions such as persistently ignoring someone at work. A single incident can amount to harassment. The following, though not an exhaustive list, may constitute harassment:

- unwanted physical contact or "horseplay" ranging from touching to serious assault;
- verbal and written harassment through jokes, offensive language, gossip and slander, letters;
- sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile or tablet devices or posted on the internet);
- offensive emails, text messages or social media content;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- isolation or non-cooperation at work, exclusion from social activities;
- intrusion by pestering, spying, following etc.;
- mocking, mimicking or belittling a person's disability;
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender; or outing or threatening to out someone as gay or lesbian.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist

jokes about a different ethnic group if the jokes create an offensive environment.

3.3 DEFINITION OF WORKPLACE BULLYING

Workplace bullying is inappropriate, offensive, intimidating, malicious, insulting or threatening behaviour, which is often an abuse of power or position, that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

It can be direct or indirect, either verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual's right to dignity at work.

The following examples may constitute bullying:

- physical or psychological threats, abuse, teasing, gossip and practical jokes;
- humiliation and ridicule either in private, at meetings or in front of customers/clients;
- name calling, insults, devaluing with reference to age, physical appearance; setting impossible deadlines;
- imposing excessive workloads;
- making unjustified criticisms and inappropriate derogatory remarks about someone's performance;
- overbearing, intimidating and/or excessive monitoring;
- removing responsibilities;
- allocating menial and pointless tasks;
- withholding information;
- refusing requests for leave, holiday or training.

It should be noted that it is the impact of the behaviour which is relevant and not the motive or intent behind it.

3.4 YOUR RESPONSIBILITIES

All employees have a responsibility to help create and maintain a working environment that respects the dignity of employees. You should be aware of the serious and genuine problems which harassment and bullying can cause, ensure that your behaviour is beyond question and could not be considered in any way to be harassment or bullying. You should discourage such behaviour by making it clear that you find it unacceptable and by supporting colleagues if they are experiencing harassment or bullying and are considering making a complaint. You should alert a Manager or Supervisor to any incidents to enable the Company to deal with the matter.

3.5 MANAGERIAL RESPONSIBILITY

Our board of directors (the board) has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for overseeing its implementation to the Group Head of Human Resources.

Managers and supervisors have a responsibility to ensure that harassment or bullying does not occur in work areas for which they are responsible.

Managers also have a specific responsibility to operate within the boundaries of this policy, ensure that all staff understand the standards of behaviour expected of them and to take action when behaviour falls below its requirements.

Managers will explain the Company's policy to their staff. They will be responsive and supportive to any member of staff who makes a complaint, provide full and clear advice on the procedure to be adopted, maintain confidentiality in all cases and ensure that there is no further problem or any victimisation after a complaint has been resolved.

The Company will provide training to ensure that all managers, supervisors and other staff are fully aware of this policy and the procedures for dealing with harassment and bullying.

3.6 PROCEDURE FOR DEALING WITH ALLEGED HARASSMENT OR BULLYING

Informal Steps

If you believe that you have been the subject of harassment or bullying, you should, in the first instance, consider whether you feel able to raise the problem informally with the person responsible. You should ask the person responsible to stop the behaviour, as it is unacceptable to you. Person to person reproof at an early stage will often be sufficient to stop the behaviour which is causing the offence without involving third parties.

If this is too difficult or embarrassing, you should speak to your line manager or the Human Resources Department, who can provide confidential advice and assistance in resolving the issue formally or informally.

If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your line manager or the Human Resources Department informally for confidential advice.

If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below.

Raising a Formal Complaint

If you decide to make a formal complaint you should do so through the Grievance Procedure as soon as possible after the incident has occurred. A copy of the Grievance Procedure features within the Employee Handbook issued upon induction. If you cannot access an Employee Handbook, please ask the Human Resources Department for a copy.

If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your Line Manager, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns that person, you should refer it to the Line Manager's Manager.

Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the time(s) and date(s) at which it occurred, the names of any witnesses and any action which has been taken so far to attempt to stop it from occurring.

Formal Investigations

All complaints will be investigated in a timely and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by an appropriate and independent colleague or a trade union

representative of your choice, who must respect the confidentiality of the investigation. You will be given a provisional timetable for the investigation. The investigator will arrange further meetings with you as appropriate throughout the investigation.

If the investigation reveals that your complaint is valid, prompt attention and action designed to stop the behaviour immediately and prevent its recurrence will be taken. In such circumstances, if relocation proves necessary, every effort will be made to relocate the harasser or bully rather than you as the victim; however, the Company will endeavour to relocate you if this is your preference.

We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example you may ask for changes to your duties or working hours so as to avoid or minimise contact with the alleged harasser or bully.

Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser or bully to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

Where your complaint is about someone other than an employee, such as a customer, supplier or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.

At the end of the investigation, the investigator will submit a report to a nominated senior manager to all relevant parties to consider the complaint. The senior manager will arrange a meeting with the employee affected, usually within a week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to be bring a colleague or a trade union representative to the meeting. A copy of the report will be given to you and to the alleged harasser. Where appropriate, a copy may also be shared with a relevant authority or third party.

You will be protected from intimidation, victimisation or discrimination for filing a complaint or assisting in an investigation. Retaliating against an employee for complaining about harassment or bullying is a disciplinary offence.

Whilst this procedure is designed to assist genuine victims of harassment or bullying, you should be aware that if you raise complaints which are proven to be deliberately vexatious, you will become subject to proceedings under the Disciplinary and Dismissal Procedure.

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

Action Following the Investigation

If the investigator considers that harassment or bullying has occurred, prompt action will be taken to address it.

Where the harasser or bully is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary and Dismissal Procedure. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is

upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.

Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under our Disciplinary and Dismissal Procedure.

Appeals

If you are not satisfied with the outcome you may appeal in writing to David Goldstraw, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you.

We will hold an appeal meeting, normally within one week of receiving your written appeal. This will be dealt with impartially by a more senior staff member who has not previously been involved in the case (although they may ask anyone previously involved to be present). You may bring a colleague or trade union representative to the meeting.

We will confirm our final decision in writing, usually within one week of the appeal hearing. This is the end of the procedure and there is no further appeal.

Protection and Support for Those Involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

If you believe you have suffered any such treatment you should inform your line manager or the Human Resources Department. If the matter is not remedied you should raise it formally using our Grievance Procedure or this procedure if appropriate.

Confidentiality and Record-Keeping

Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary and Dismissal Procedure.

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Information and Security Policy.

4. DISCIPLINARY AND DISMISSAL PROCEDURE

The aims of this Disciplinary Procedure are to provide a framework within which managers can work with employees to maintain satisfactory standards of conduct and to encourage improvement where necessary.

The Procedure has been designed so that the Company may deal with disciplinary or dismissal matters in a fair and consistent manner.

The Disciplinary and Dismissal Procedure described below does not form part of your Contract of Employment and may be amended at any time. We may also vary this procedure, including any time limits, as appropriate in any case.

The procedure applies to all employees regardless of length of service.

The procedure is used to deal with misconduct. It does not apply to cases involving genuine sickness absence, proposed redundancies or poor performance. In those cases reference should be made to the appropriate policy or procedure.

Before considering formal warning or dismissal, steps will be taken by the Company to establish the facts.

Minor Conduct Issues

Minor conduct issues can often be resolved informally between you and your line manager. These discussions should be held in private and without undue delay whenever there is cause for concern. Where appropriate, a note of any such informal discussions may be placed on your personnel file. In certain circumstances, it may be appropriate for verbal warnings to be referred to at the formal stages of this procedure. Formal steps will be taken under this procedure if the matter is not resolved, or if informal discussion is not appropriate (for example, because of the seriousness of the allegation).

If you have difficulty at any stage of the procedure because of a disability, you should discuss the situation with your line manager or a member of the Human Resources Department as soon as possible.

Confidentiality

Our aim is to deal with disciplinary matters sensitively and with due respect for the privacy of any individuals involved. All employees must treat as confidential any information communicated to them in connection with an investigation or disciplinary matter.

You, and anyone accompanying you (including witnesses), must not make electronic recordings of any meetings or hearings conducted under this procedure. The making of non-permitted or non-consensual recordings could result in disciplinary action for failing to comply with a reasonable management instruction.

You will normally be told the names of any witnesses whose evidence is relevant to disciplinary proceedings against you, unless we believe that a witness's identity should remain confidential.

Investigations

The purpose of an investigation is for us to establish a fair and balanced view of the facts relating to any disciplinary allegations against you, before deciding whether to proceed with a disciplinary hearing. The amount of investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents. The Human Resources Department will usually appoint an Investigating Officer to carry out the investigation.

Investigative interviews are solely for the purpose of fact-finding and no decision on disciplinary action will be taken until after a disciplinary hearing has been held.

You do not normally have the right to bring a companion to an investigative interview. However, we may allow you to bring a companion if it helps you to overcome any disability, or any difficulty in understanding English.

You must co-operate fully and promptly in any investigation. This will include informing us of the names of any relevant witnesses, disclosing any relevant documents to us and attending investigative interviews if required

Criminal Allegations

Where your conduct is the subject of a criminal investigation, charge or conviction we will investigate the facts before

deciding whether to take formal disciplinary action.

We will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where you are unable or have been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, we may have to take a decision based on the available evidence.

A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to your employment.

Suspension

In certain circumstances, for example in cases of potential gross misconduct, where relationships have broken down or where it is considered that there are risks to the Company's property or responsibilities to others, you may be suspended with pay whilst an unhindered investigation is conducted. Such a suspension, which will not be unnecessarily protracted, will not be considered as disciplinary action and does not imply that any decision has already been made about the allegations.

The suspension will be for no longer than is necessary to investigate the allegations and we will confirm the arrangements to you in writing. While suspended you should not visit our premises or contact any of our clients, customers, suppliers, contractors or staff, unless you have been authorised to do so by your Line Manager.

Notification of a Hearing

Following any investigation, where a case may warrant disciplinary action or dismissal, a written statement of your alleged misconduct will be sent or given to you.

If we consider there are grounds for disciplinary action, you will be required to attend a disciplinary hearing. We will inform you in writing of the allegations against you, the basis for those allegations, and what the likely range of consequences will be if we decide after the hearing that the allegations are true. We will also include the following where appropriate:

- (a) a summary of relevant information gathered during the investigation;
- (b) a copy of any relevant documents which will be used at the disciplinary hearing; and
- (c) a copy of any relevant witness statements, except where a witness's identity is to be kept confidential, in which case we will give you as much information as possible while maintaining confidentiality.

You will be invited in writing to attend a meeting, which will take place after you have been informed of the basis for the grounds given in the statement and have had a reasonable opportunity to consider your response. The letter will give notice of the date, time and place of the disciplinary hearing. The hearing will be held as soon as reasonably practicable, but you will be given a reasonable amount of time to prepare your case based on the information we have given you.

You will have every opportunity to make your responses during the meeting, which will be considered prior to a decision being reached.

The right to be accompanied

You may bring a companion to any disciplinary hearing or appeal hearing under this procedure. The companion may be either an accredited trade union representative or a colleague. You must tell the Disciplinary Manager who your chosen companion is, in good time before the hearing.

A companion is allowed reasonable time off from duties without loss of pay but no-one is obliged to act as a companion if they do not wish to do so.

If your companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards, we may ask you to choose someone else.

We may, at our discretion, allow you to bring a companion who is not a colleague or union representative (for example, a member of your family) if this will help overcome a disability, or if you have difficulty understanding English.

Procedure at Disciplinary Hearings

If you or your companion cannot attend the hearing you should inform us immediately and we will arrange an alternative time. You must make every effort to attend the hearing, and failure to attend without good reason may be treated as misconduct in itself. If you fail to attend without good reason, or are persistently unable to do so (for example for health reasons), we will complete the hearing and may have to take a decision based on the available evidence.

The hearing will be chaired by the appointed Disciplinary Manager. A member of the Human Resources Department may also be present. You may bring a companion with you to the disciplinary hearing.

At the disciplinary hearing we will go through the allegations against you and the evidence that has been gathered. You will be able to respond and present any evidence of your own. Your companion may make representations to us and ask questions, but should not answer questions on your behalf. You may confer privately with your companion at any time during the hearing.

You may ask relevant witnesses to provide a written signed statement for the purposes of the hearing, copies of which should be provided in sufficient time ahead of the hearing. You will be given the opportunity to respond to any information given in a witness statement.

We may adjourn the disciplinary hearing if we need to carry out any further investigations such as re-interviewing witnesses in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

After the meeting you will be informed of the decision and our reasons for it, in writing, usually within one week of the disciplinary hearing. We will also notify you of the right to appeal against the decision if you are not satisfied with it.

Disciplinary Penalties

Where a case warrants formal warning or dismissal, the decision will be based on the factor(s) from the following list, which the Company decides are relevant; the nature or continuance or seriousness of the offence or deficiency or other matter, consistency, your disciplinary record, general record, the circumstances, your position and any special factors or considerations.

Where a case warrants a formal warning relating to conduct or performance, the aim will be to encourage the improvement required for you to meet an acceptable standard.

Depending on the severity of the offence and length of service, disciplinary action can be started at any stage and may take one of the forms set out below. No penalty should be imposed without a hearing. We aim to treat all employees fairly and consistently, and a penalty imposed on another employee for similar misconduct will usually be taken into account but should not be treated as a precedent. Each case will be assessed on its own merits.

You will not normally be dismissed for a first act of misconduct, unless we decide it amounts to gross misconduct or you have not yet completed your probationary period.

Stage 1

A First Written Warning one copy of which will be retained by you and one enclosed within your Personnel File. It will usually be appropriate for a first act of misconduct where there are no other active written warnings on your disciplinary record.

Stage 2

- A Final Written Warning advising you that further breaches of these rules will render you liable to dismissal. You will retain one copy of this and one will be enclosed within your Personnel File. It will usually be appropriate for:

(a) misconduct where there is already an active written warning on your record; or

(b) misconduct that we consider sufficiently serious to warrant a final written warning even though there are no other active warnings on your record.

Stage 3

- Dismissal with or without notice depending on the severity of the offence. It will usually only be appropriate for:

(a) any misconduct during your probationary period;

(b) further misconduct where there is an active final written warning on your record; or

(c) any gross misconduct regardless of whether there are active warnings on your record. Gross misconduct will usually result in immediate dismissal without notice or payment in lieu of notice (summary dismissal).

- The Effect of A Warning

Written warnings will set out the nature of the misconduct, the change in behaviour required, the period for which the warning will remain active, and the likely consequences of further misconduct in that active period.

A written warning will remain active for either six or twelve months, depending on the circumstances of the offence, and a final written warning will usually remain active for 12 months. In exceptional cases verging on gross misconduct, a final written warning may state that it will remain active indefinitely. Your conduct may be reviewed at the end of a warning's active period and if it has not improved sufficiently we may decide to extend the active period.

After the active period, the warning will remain permanently on your personnel file but will be disregarded in deciding the outcome of future disciplinary proceedings.

Appeals

You may appeal against disciplinary action taken against you by applying within five working days, in accordance with the Appeal Procedure. If you feel that disciplinary action taken against you is wrong or unjust you should submit your appeal in writing, stating your full grounds of appeal.

If you are appealing against dismissal, the date on which dismissal takes effect will not be delayed pending the outcome of the appeal. However, if your appeal is successful you may be reinstated with no loss of continuity or pay.

If you raise any new matters in your appeal, we may need to carry out further investigation. If any new information comes to light we will provide you with a summary including, where appropriate, copies of additional relevant documents and witness statements. You will have a reasonable opportunity to consider this information before the hearing, and you or your companion may comment on any new evidence arising during the appeal before any decision is taken.

We will give you written notice of the date, time and place of the appeal hearing. This will normally be two to seven days after you receive the written notice.

In exceptional circumstances only, the appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at our discretion depending on the circumstances of your case. In any event the appeal will be dealt with as impartially as possible.

Where possible, the appeal hearing will be conducted impartially by a more senior manager who has not been previously involved in the case. A member of the Human Resources may be present. You may bring an employee companion or certified Trade Union representative with you to the appeal hearing.

We may adjourn the appeal hearing if we need to carry out any further investigations in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

Following the appeal hearing we may:

- (a) confirm the original decision; or
- (b) revoke or adjust the original decision; or
- (c) substitute a different penalty (which could be more or less severe).

We will inform you in writing of our final decision as soon as possible, usually within a calendar week of the appeal hearing. Where possible we will also explain this to you in person. There will be no further right of appeal.

Note: At all stages of the disciplinary procedure you will:

- Be given the opportunity to reply to all and any allegations made against you before any decision or disciplinary action is taken
- Have the opportunity to be accompanied and assisted by a work colleague or accredited trade union representative.

5. GRIEVANCE PROCEDURE

It is our policy to ensure that all employees have access to a procedure to help deal with any grievances relating to their employment fairly and without unreasonable delay. We aim to investigate any formal grievance you raise, hold a meeting to discuss it with you, inform you in writing of the outcome, and give you a right of appeal if you are not satisfied.

This procedure applies to all employees regardless of length of service.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Raising Grievances Informally

Where you have a grievance relating to any aspect of your employment you should in the first instance seek to resolve this on an informal basis with your immediate supervisor. If you feel unable to speak to your manager, for example, because the complaint concerns him or her, then you should speak informally to a more senior manager. If this does not resolve the problem you should follow the procedure set out below.

Using This Procedure

Issues that could cause grievances may include:

- (a) terms and conditions of employment;
- (b) health and safety;
- (c) work relations;
- (d) bullying and harassment;
- (e) new working practices;
- (f) working environment;
- (g) organisational change; and
- (h) discrimination.

This Grievance Procedure should not be used to complain about dismissal or disciplinary action. If you are dissatisfied with any disciplinary action, you should submit an appeal under the appropriate procedure.

We have a separate Anti-harassment and Bullying Policy that may be useful if you have been the victim of bullying or harassment or wish to report an incident of bullying or harassment involving other people which is set out at point 3 of the Handbook.

We operate a separate Whistleblowing Policy to enable employees to report illegal activities, wrongdoing or malpractice. However, where you are directly affected by the matter in question, or where you feel you have been victimised for an act of whistleblowing, you may raise the matter under this Grievance Procedure.

If you have difficulty at any stage of the Grievance Procedure because of a disability or because English is not your first language, you should discuss the situation with your Line Manager or the Human Resources Department as soon as possible.

Formal Written Grievances

- You should first set out your grievance in writing and send or give the statement or copy of it to your immediate supervisor, indicating that it is a formal grievance. This should be done in confidence giving the basis for the grievance to allow your supervisor to consider his or her response to that information. If the grievance concerns your line manager, you may submit it to your Line Manager's Manager instead. You will then be invited to attend a hearing to discuss the grievance.
- The written grievance should contain a brief description of the nature of your complaint, including any relevant facts, dates, and names of individuals involved. In some situations we may ask you to provide further information.

Investigations

- It may be necessary for us to carry out an investigation into your grievance. The amount of any investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents. The investigation may be carried out by your line manager or someone else appointed by us.
- You must co-operate fully and promptly in any investigation. This may include informing us of the names of any relevant witnesses, disclosing any relevant documents to us and attending interviews, as part of our investigation.
- We may initiate an investigation before holding a grievance meeting where we consider this appropriate. In other cases we may hold a grievance meeting before deciding what investigation (if any) to carry out. In those cases we may hold a further grievance meeting with you after our investigation and before we reach a decision.

Right to be Accompanied

- You may be accompanied and assisted at all stages of your grievance hearing by a work colleague or accredited trade union representative. You may bring a companion to any grievance meeting or appeal meeting under this procedure. You must tell the Grievance Manager who your chosen companion is, in good time before the meeting.
- At the meeting, your companion may make representations to us and ask questions, but should not answer questions on your behalf. You may talk privately with them at any time during the meeting.
- Acting as a companion is voluntary and your colleagues are under no obligation to do so. If they agree to do so they will be allowed reasonable time off from duties without loss of pay to act as a companion.
- If your chosen companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards, we may ask you to choose someone else.
- We may, at our discretion, allow you to bring a companion who is not a colleague or union representative (for example, a member of your family) if this will help overcome a disability, or if you have difficulty understanding English.

Grievance Meetings

- When your supervisor has had a reasonable opportunity, normally five working days if at all possible, to consider the information that you have provided and carry out any investigations deemed necessary, the grievance meeting will take place.
- You and your companion (if any) should make every effort to attend grievance meetings. If you or your companion cannot attend at the time specified, you should inform us immediately and we will try, within reason, to agree an alternative time.
- The purpose of a grievance meeting is to enable you to explain your grievance and how you think it should be resolved, and to assist us to reach a decision based on the available evidence and the representations you have made.
- After an initial grievance meeting we may carry out further investigations and hold further grievance meetings as we consider appropriate. Such meetings will be arranged without unreasonable delay.
- After the meeting, your Line Manager will then inform you in writing of their decision as to the response to the grievance and notify you of the right to appeal against the decision if you are not satisfied with it. This correspondence will usually be sent to you within five working days of the grievance meeting where possible.

Appeals

- If you do wish to lodge an appeal against the decision, you must inform the person nominated by Restore Harrow Green. You should state your full grounds of appeal in writing, within five working days of the date on which the decision was sent or given to you. You will then be invited to attend an appeal meeting, normally within one week of receiving your written appeal. This will be dealt with impartially by a more senior manager who has not previously been involved in the case (although they may ask anyone previously involved to be present). This will usually be your Line Manager's Manager, typically being the person responsible for the areas within which you work. You have a right to bring a companion to the meeting.
- Should your Manager/Director fail to hold the hearing within five working days of you raising the matter with him/her, you should refer the matter in writing to the Human Resources Department.
- After the meeting you will be informed of the final decision in writing, usually within five working days of the appeal meeting. This is the end of the procedure and there is no further right of appeal.
- Full details of your grievance, together with all related correspondence will be filed in your Personnel File unless you request in writing that this is not to be done.

6. EMPLOYEE DOCUMENTATION

All employees are provided with comprehensive induction training when first joining Restore Harrow Green. Induction packs are issued which include an introduction to all areas of operation, health and safety, quality, customer care and policy and procedure. During the induction process, particular attention is paid to Restore Harrow Green's Equal Opportunities Policy and its application in all areas of employment, not limited to recruitment, selection, training, promotion and development.

An Employee Handbook is provided to each member of staff upon being issued with an offer of employment which again contains the Equal Opportunities Policy together with the Harassment Policy and Procedure, Grievance Procedure and Disciplinary and Dismissal Procedure.

Unlawful discrimination, harassment or any act which fundamentally breaches the dignity of people at work is deemed by Restore Harrow Green to be Gross Misconduct, as outlined in the Employee Handbook. A copy of this handbook is available on request.

7. MONITORING

The policy and practice of Restore Harrow Green requires that entry into employment with the company and progression within employment will be determined only by personal merit. No applicant or member of staff will be treated less favourably on the grounds of race, colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation, marital or civil partnership status, disability, age, pregnancy and maternity, gender reassignment or part-time or fixed term status.