



1. **Equal Opportunities & Harassment**

1.1 **Policy**

Great Portland Estates plc and its subsidiaries (the “Company”) aim to be an equal opportunity employer. This is done not only to conform with current employment law, but to harness the full potential of our staff to make sure all people are treated fairly and with dignity.

In accordance with the above aim, the Company endeavours to treat all employees and job applicants on the basis of merit and ability to do the job without any influence of race, colour, age, religion, sex, marital status, national origin, physical or mental disability, sexual orientation or any other grounds which are unjustifiable in terms of equality of opportunity.

The Company endeavours not to discriminate in the areas of discipline, selection, transfer, training, access to benefits and services dismissal. As part of the above principle, male and female staff should receive equal pay for the same work, for work rated as equivalent and for work of equal value.

It is also the policy of the Company that all employees be allowed to work in an environment free from unsolicited or unwelcome sexual overtures or comments, racial harassment and unsolicited or unwelcome comments relating to disability.

This policy does not form part of any employee’s contract of employment and the Company reserves the right to amend or issue a replacement policy at any time.

1.2 **Procedure**

1.2.1 **Implementation**

- The person with ultimate responsibility for implementing this policy and to whom all queries should be directed to is the Company Secretary.

1.2.2 **Purpose of the Policy and Responsibility of all Staff**

- A number of Acts have been passed by Parliament recognising that discrimination and prejudice exists against various groups of people. These Acts include the Sex Discrimination Act 1975, the Race Relation Act 1976, the Disability Discrimination Act 1995, Employment Equality (Sexual Orientation) Regulations 2003 and Employment Equality (Religion or Belief) Regulations 2003. They exist to encourage employers and employees to eliminate prejudice and discrimination in their workforce.

- It is recognised by the Company that reaching its aim involves work from both employees and management, and that it will be an ongoing process. Each manager and each employee, whether full-time, part-time or temporary, has an individual responsibility to adhere to the policy and to ensure all individuals under their supervision do so and that fellow employees and any third parties with whom employees deal on behalf of the Company are treated with dignity and respect.
- Each Manager also has the responsibility to ensure the protection and support for any employee who may be considering or has brought a complaint informally or formally or who has given evidence at any disciplinary hearing brought as a result of any breach of this policy. An employee bringing false accusations may be subject to disciplinary proceedings.

1.2.3 Types of Discrimination

- Direct discrimination consists of treating a person on grounds of race, colour, age, religion, sex, marital status, national origin, physical and mental disability or sexual orientation less favourably than others.
- Indirect discrimination exists where in any circumstances a requirement or condition which, although applied equally to persons of all groups, is such that a considerably smaller proportion of a particular group can comply with it and it cannot be shown to be justifiable on other grounds. It would also include the harassment and victimisation of staff.
- Victimisation includes, in particular, victimisation of an individual who has made or is considering making a complaint about discrimination in good faith.
- Harassment is unwanted conduct based on sex or race which affects the dignity of men and women at work. It is the unreciprocated and offensive nature of the harassment which is important and such behaviour will be viewed from the point of view of the recipient. Examples of conduct which may constitute sexual harassment and are clearly unacceptable are; giving someone unwanted sexual attention, suggestions that sexual favours may further an employee's career or that a refusal may hinder it or lewd, suggestive or over-familiar behaviour.

1.2.4 Advice and Assistance

- If any employee is subjected to discrimination or harassment on grounds of sex, race or disability, then initially they should attempt to resolve the problem informally by explaining clearly to the person engaging in the unwanted conduct that the behaviour is not welcome, that it offends them and interferes with their work or in the case of discrimination that the behaviour is illegal.
- If an employee would find this too difficult or embarrassing then they should seek confidential support from their Manager, or if they wish, from the Company Secretary, and may be accompanied by a fellow employee.

- All allegations will be dealt with as soon as possible, and confidentially, and employees will be protected from victimisation.
- Employees who are disabled or become disabled in the course of their employment should inform and may also wish to advise the Company of any “reasonable adjustments” to their employment or working conditions which they consider to be necessary or which they consider would assist them in the performance of their duties. Careful consideration will be given to any proposals of this nature and, where reasonably practicable, such adjustments will be made. There may, however, be circumstances where it will not be reasonable, or reasonably practicable, for the Company to accommodate those proposals, and where the Company would be justified not to accommodate them in accordance with the statutory provisions.

1.2.5 Grievance Procedure

- If an employee regards attempts at informal resolution as inappropriate or if informal attempts have failed or been unsatisfactory, then a formal complaint may be made to the Company Secretary.
- A confidential and independent investigation will be carried out as quickly as possible. Both the complainant and the alleged harasser or discriminator will have the right to be accompanied by a colleague and the alleged harasser or discriminator will be given full details of the complaint and an opportunity to respond.

1.2.6 Following the Investigation

- If appropriate, disciplinary action will then take place, which may include summary termination of employment of the harasser or discriminator.
- Where a complaint is not upheld, for instance because the evidence is regarded as inconclusive, consideration will be given to transferring or re-scheduling the duties of the complainant or the alleged harasser, if at all possible, and depending on operational and staffing requirements.
- It will also be considered a disciplinary offence to victimise an employee for bringing a complaint of harassment or discrimination in good faith.