## equal opportunities policy

We are committed to being an equal opportunities model agency in respect of our models, employees clients and suppliers. We oppose all forms of unlawful discrimination including discrimination because of sex, marriage or civil partnership, gender reassignment, pregnancy or maternity, sexual orientation, race, (including national origin andnationality), religion or belief, disability and age.These are known by the UK Equality and Human Rights Commissionas"protectedcharacteristics". This includes consistent and objective standards in recruitment, selection, appraisal, promotion, reward, training, personal development and treatment of people prior to, or after, returning from maternity leave.

The Company requires everyone to act in accordance with this policy, be they staff, models or clients, and to be treated fairly and without discrimination. If you anyone is subject to harassment based on discrimination or victimised, it should immediately be raised with a director of the Company. It is not just the Company who may be liable for unlawful discrimination – sometimes those who participate can be found to be personally liable to the victim.

All Head Bookers are responsible for ensuring that this policy is applied within their own area. Staff have a personal responsibility to comply with this policy and do their best to ensure that it is adhered to in their day to day work. No one must discriminate or help others to do so in contravention of this policy. Breaches of this policy will be taken seriously and are likely to result in disciplinary action, up to and including dismissal. Individuals may also be personally liable towards anyone unlawfully discriminated against and may have to pay compensation on top of any compensation the Company might be ordered to pay.

## harassment policy and procedure

The Company is committed to keeping the working environment, for staff as well as models, free from harassment of any kind by fostering an environment where everyone can work in a professional manner and where relationships with each other are based on dignity and respect. Harassment in the workplace is unacceptable and unlawful. We therefore have a procedure for reporting instances of any harassment and for dealing with the individuals concerned in a confidential and professional way.

Bullying and harassment include conduct that has the purpose or effect of creating an intimidating, degrading or offensive environment. This includes inappropriate actions, behaviour, comments or

physical contact that cause offence or objection. This can take the form of physical harassment, ranging from unnecessary body contact to assault; verbal harassment such as unwelcome remarks, suggestions, and propositions, offensive jokes (including those by email), gossip, bullying or pestering or can be non-verbal harassment such as the displaying of offensive literature, pictures/posters graffiti, isolation or non-co-operation. Harassment can affect people in a number of ways, often impacting confidence and self-esteem, and can cause stress and anxiety. It can be classed as bullying.

Individuals who are subjected to bullying and harassment related to "protected characteristics" have special protection. Both the Company, as employer, and the person carrying out the bullying or harassment can be liable

We do not tolerate bullying or harassment whether it is related to "protected characteristics" or not. This applies not only in the workplace, for staff as well as models, but outside work where there is a work connection such as a social event and, of course, a model assignment. Such behaviour is normally gross misconduct and likely to result in dismissal; in serious cases, it may be a criminal offence.

Bullying or harassment related to "protected characteristics" has a broad meaning. It is unlawful:

- even though it was unintended and the person doing it was unaware that he or she might cause offence.For example, individuals may feel that they know their colleagues and that they will not be offended by a joke about race, religion or sexual orientation, but if they (or someone who over-hears) turn out to be offended, this is likely to be seen as harassment.
- even though the person complaining does not have the "protected characteristics".
- if it is based not on the characteristics of a colleague but on someone with whom he or she associates.

Sometimes conflicts arise between persons with different "protected characteristics" (for example sexual orientation and religion). We do not expect everyone to be friends, but we do require staff, models, clients and others to treat each other with respect and dignity regardless of privately held views.

If a clientor other third party (someone who is not employed by us) subjects a member of staff or a model to harassment or bullying, we should be informed. We will do what we reasonably can to prevent it happening again.

## procedure for reporting

It is important that anyone who is the recipient of harassing behaviourshould feel able to come forward. For this reason, our procedure allows for the resolution of genuine complaints to be treated either formally or informally, with the aim of ensuring that the behaviour stops and that the harasser is spoken to about their behaviour.

All reports will be taken seriously and will be dealt with in a fair and reasonable manner, with respect to confidentiality.

We will ensure that complaints are treated seriously, promptly and with sensitivity. In each instance every effort will be made to treat the complaint with complete confidentiality although there may be the need to refer to witnesses or to directly involve others.

If an investigation upholds a complaint, action will be taken immediately to stop the harassment and prevent its recurrence.