

25EP Anti-Discrimination Policy Anti-Harassment Policy

Discrimination, harassment and bullying pollute the working environment and can have a devastating effect on the health, confidence and morale of those affected. At 25EP we are committed to providing an environment free from discrimination, harassment and bullying and ensuring that all 25EP employees, agents and contractors (collectively “**25EP Staff**”), members and guests are treated, and treat others, with dignity and respect.

We will take allegations of discrimination, harassment or bullying at 25EP seriously and address them promptly and confidentially where possible. We will not permit, condone or tolerate discrimination, harassment or bullying at our club.

Our members and their guests have a duty to treat 25EP Staff and other members and their guests with dignity at all times, and not to discriminate against or harass other individuals, regardless of their status. This policy applies to all 25EP members and guests and may be reviewed and altered by 25EP from time to time.

Please note that this policy is not intended as a summary of the law, nor is it intended to affect your legal rights.

1. Discrimination

All our members and guests will receive and must provide equal treatment to other individuals regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity leave, race, colour, nationality or ethnic or national origins, religion or belief, sex or sexual orientation (collectively referred to in this policy as “**protected characteristics**”).

The following forms of discrimination are prohibited at our club and are unlawful:

- a. **Direct discrimination:** treating someone less favourably because of a protected characteristic.
- b. **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular protected characteristic more than others, and is not justified.
- c. **Harassment:** this includes sexual harassment and other unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- d. **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- e. **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

2. Harassment and Bullying

What is harassment? Harassment is any 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. A single incident can amount to harassment. 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 does not fall within any of these categories.

Harassment may include, for example: unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing; unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); offensive e-mails, text messages or social media content; mocking, mimicking or belittling a person's disability.

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.

What is bullying? Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power 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.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example: physical or psychological threats; inappropriate derogatory remarks.

3. Breaches of this Policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Complaints Procedure. Serious cases of deliberate discrimination, harassments or bullying may lead to termination of your membership.

4. Complaints Procedure

If you believe that you have suffered discrimination or experienced harassment or bullying at our club (by 25EP Staff, other members or guests) you can raise the matter through our Complaints Procedure. Complaints about discrimination, harassment or bullying at 25EP are taken seriously and will be treated in confidence and investigated as appropriate.

Complaints about discrimination, harassment or bullying should be submitted in writing to info@25-ep.com and should set out, in as much detail as possible, the nature of the complaint, including any relevant facts, dates and names (or a description) of the individuals involved.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused will only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between the person making the complaint and the person accused during the investigation, including suspension of the accused's membership (or, in the case of 25EP staff, employment) in serious cases.

Once the investigation is complete, we will inform you of our decision in writing. If we consider you have been discriminated against, harassed or bullied by a member of 25EP staff or another 25EP member or guest, we will consider what action is appropriate to deal with the problem, which may include issuing a formal warning to the perpetrator or, in more serious cases, suspension or termination of membership or, in the case of guests, access to the club. If your complaint relates to a

member of 25EP staff, we will follow our usual employee disciplinary procedure which may include a formal warning or termination of the perpetrator's employment. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

You must not be victimised or retaliated against for complaining about discrimination, harassment or bullying. However, making a false allegation deliberately and in bad faith may lead to termination of your membership.

Last Updated: May 2020