

Open Media Policies

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Anti-Bribery Policy



Introduction

Our organisation is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas.

Policy Principles

This policy outlines our position on preventing and prohibiting bribery. Our organisation will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

This policy applies to all employees of our organisation, and to temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, our organisation (“associated persons”).

The policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

Every employee and associated person acting for, or on behalf of, our organisation is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to our reputation and standing.

Our organisation may also face criminal liability for unlawful actions taken by its employees or associated

persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time.

This policy covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, our organisation; and the consequences of any breaches of this policy.

Bribery Act 2010

Our organisation is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.

A bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public or business activities or any activity performed in the course of a person’s employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed if:

- an employee or associated person acting for, or on behalf of, our organisation offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, our organisation offers, promises, or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence); and
- our organisation does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited?

Employees or associated persons are prohibited from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain a:

- commercial, contractual, or regulatory advantage

for our organisation in either obtaining or maintaining organisation business, or

- personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers, and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Corporate entertainment, gifts, hospitality, and promotional expenditure

Our organisation permits corporate entertainment, gifts, hospitality, and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of our organisation

Provided that it is:

- arranged in good faith; and
- not offered, promised or accepted to secure an advantage for our organisation or any of its employees or associated persons or to influence the impartiality of the recipient.

We will authorise only reasonable, appropriate, and proportionate entertainment and promotional expenditure.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the CEO.

Employees are required to set out in writing:

- the objective of the proposed client entertainment

- or expenditure;
- the identity of those who will be attending;
- the organisation that they represent; and
- details and rationale of the proposed activity.

We will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. We will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence, or a particular business benefit was being sought (for example prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers, or other business contacts should be reported immediately to the CEO.

Action by our organisation

We will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. We will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. We may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, our organisation who are found to have breached this policy.

We may also report any matter to the relevant authorities, including the Serious Fraud Office and the police. We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the CEO is required, together with details of the intended recipients, reasons for the gift and business objective.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with our expenses policy.

Child Labour Policy



Introduction

Open is committed to building an organisation that is sustainable, ethical and champions the rights and freedoms of everyone.

Policy Principles

‘People’ is one of three pillars of our business strategy, and we recognise our responsibility to help improve, develop, and support the lives of individuals and groups within our workplace and the communities in which we operate.

We recognise it is our duty to identify and ensure the welfare and protection of any child or young people within our business, supply chains or partnerships.

Definitions

In this policy, the definitions as follows:

“Child” means anyone under 16 years of age, unless national or local legislation stipulates a higher mandatory school leaving or minimum working age, in which case the higher age shall apply.

“Child labour” means any work carried out by a child or young person.

Our Objectives

Through effective governance, Open will strive to protect the rights of young workers and remedying child labour by:

- Carrying out adequate right to work checks before recruiting any individual to employment in Open.
- Supporting meaningful and suitable work for young persons, ensuring that they are not subjected to any hazardous work
- Identifying any concerns about young, migrant workers in its recruitment process and immediately reporting to the relevant authorities
- Supporting and encouraging our partners and suppliers to demonstrate transparency on conditions and practices and to engage with Open in providing related information as requested.
- Requesting information about the supply chains of our suppliers and partners to ensure a thorough approach to identifying and eliminating child labour.
- Where child labour has been identified; supporting the welfare of that child or young person to safety.
- Make Open aware immediately of any concerns regarding child labour within their operations or those of their suppliers, service providers or partners.
- Share their child labour policy and/or prevention systems with Open Media as and when requested.
- Provide a guarantee to Open Media that their recruitment processes include verification and accuracy of right to work documents.
- Where young workers are employed, ensure that all relevant legislation is adhered to, and the welfare of those individuals is a priority within the workplace.

Supplier and partner expectations

Open expect all suppliers and partners to share our commitment to eliminating child labour within their own business operations and those within their supply chains.

We expect all suppliers and partners to:

- Continuously review and monitor their business operations and those of their suppliers, service providers or partners

Cessation

Open Media reserves the right and is prepared to terminate its relationship with suppliers or partners where they are found to be in deliberate breach of this policy or do not support its objectives.

Responsibility

The CVO and Operations Manager maintain responsibility for this policy and will review it in collaboration with HR, partners and suppliers to ensure compliance with up-to-date legislation and best practice.

Disciplinary Policy



Introduction

As an employer, we hope that this policy is something that we apply rarely and that you have don't have to refer to. However, occasionally we may have to rely on this policy to address poor conduct or performance and to ensure that we maintain a harmonious and productive working environment.

Policy Principles

The purpose of this policy is to bring about improvement and it will be applied with that in mind. If you are subject to disciplinary action, you can be assured that the correct procedure will be followed, and we will ensure fairness and consistency in our approach across the company.

In the case that disciplinary action is taken against you (except for dismissal), the improvements required of you and the relevant time-frames will be clearly outlined to you and we will identify any ways in which we can support you to achieve those outcomes.

- No disciplinary action will be taken against any employee until the case has been fully investigated.
- At every stage in the procedure the employee will be advised of the nature of the complaint against them and will be given the opportunity to state their case before any decision is made.
- At all stages the employee will have the right to be accompanied by a work colleague or trade union official.

- No employee will be dismissed for a first breach of discipline except in the case of gross misconduct when the penalty may be dismissal without notice or payment in lieu of notice.
- An employee will have the right to appeal against any disciplinary sanction imposed.
- Open Media reserves the right to appoint an Independent Professional Adviser with experience of disciplinary procedures and appeals to support in the investigation and/or disciplinary process.
- The procedure may be implemented at any stage if the employee's alleged misconduct warrants such action.

All employees have the right to Appeal in writing within 5 working days of being informed of the decision.

The Procedure

If you are subject to disciplinary action, a thorough investigation will take place by an appointed manager before any decision to proceed is take. Should it be recommended that disciplinary action is taken, you will always be notified in writing of the allegations, invited to a hearing to state your case and provided with all investigation documents.

A manager who has not been involved in the case will chair the disciplinary hearing, and you have the right to be accompanied by a colleague or Trade Union representative of which you are a member.

Minor faults will be dealt with informally but where the matter is more serious the following will be used.

Disciplinary sanctions

The potential outcomes of a disciplinary hearing are as follows:

1. No further action
2. A verbal warning (first stage)
3. A first written warning (second stage)
4. A final written warning (final stage)
5. Dismissal (with notice, or without notice in cases of gross misconduct.)

Where a first offense is considered significantly serious, the disciplinary manager has the right to jump to the second or final stage. If the allegations against you are proven to be considered gross misconduct, you will summarily be dismissed without notice.

Right of appeal

You have the right to appeal any disciplinary action taken against you. Any appeal will be heard by a senior manager or Director who has had no previous involvement in the case.

A Three-Step Process

Step 1: The Written Statement

The reasons for the disciplinary action will be given to you in writing and a time proposed for a formal hearing. You will receive the written statement in good time before the proposed hearing to allow you time to consider your response.

Step 2: The Hearing

You have a duty to take all reasonable steps to attend the hearing. You have the right to be accompanied by a work colleague or trade union official. The meeting will be held by a senior manager, and you will have the opportunity to state your side of the case. You will then be informed of the decision in writing. You have the right to appeal against the decision.

Step 3: The Appeal Meeting

If you wish to appeal you must inform the Manager who carried out the disciplinary hearing in writing within 5 working days of the decision. You have the right to be accompanied by a work colleague or trade union official. Following the appeal meeting you will be informed of the decision in writing.

Stage 1 – Verbal Warning

If conduct or performance does not meet acceptable standards the employee will normally be given a formal Verbal Warning. They will be advised of the reason for

the warning (that is the first stage of the disciplinary procedure) and of their right of appeal. A written statement of the Verbal Warning will be kept but it will be spent after 3 months, subject to satisfactory conduct and performance.

Stage 2 – Written Warning

If the offence is a serious one, or if a further offence occurs, a written warning will be given to the employee by the supervisor. This will give details of the complaints, the improvement required and the timescale. It will warn that action under Stage 3 will be considered if there is no satisfactory improvement and will advise of the right of appeal.

The written warning will be kept on record but will be spent after 6 months subject to satisfactory conduct and performance.

Stage 3 – Final Written Warning or Disciplinary Suspension

If there is still failure to improve and conduct or performance is still unsatisfactory, a final written warning will normally be given to the employee. This will give details of the complaint, will warn that dismissal will result if there is no satisfactory improvement and will advise of the right of appeal. The written statement will be kept on record but will be spent after 12 months (in exceptional cases the period may be longer) subject to satisfactory conduct and performance.

Stage 4 – Dismissal

If conduct or performance is still unsatisfactory and the employee still fails to reach the prescribed standards, dismissal will normally result. Only the appropriate senior manager can take the decision to dismiss. As soon as reasonably practicable, the employee will be provided with written reasons for dismissal, the date on which employment will terminate and the right of appeal.

Offences that could warrant dismissal are detailed in the following list and provides examples of offences which are normally regarded as gross misconduct:

- Theft, fraud, deliberate falsification of records.
- Fighting, assault on another person
- Deliberate damage to Organisation property
- Attending work under the influence of drink or drugs
- Consumption of alcohol or use of drugs whilst on the premises
- Negligence which causes unacceptable loss, damage or injury
- Acts of insubordination, refusal to carry out lawful and reasonable orders
- Racial/religious/sexual harassment, bullying

- Clocking in or out for another person
- An offence committed in breach of a warning for a minor offence
- Absence from the Organisation premises without permission
- Smoking in areas or at times not allocated for smoking
- Unauthorised use of the Organisation's transport and equipment e.g. road transport, forklift trucks
- Misuse of email / Internet.

It should be clearly understood that the list of offences given is not in any way exhaustive, i.e., there may be other offences which are not listed but which require equal action by the Management.

Where a first offense is considered significantly serious, the disciplinary manager has the right to jump to the second or final stage. If the allegations against you are proven to be considered gross misconduct, you will summarily be dismissed without notice.

Investigation Suspension

If the employee is accused of an act of gross misconduct, they may be suspended from work on full basic pay, normally for no more than 5 working days, while Open Media investigates the alleged offence. If, on completion of the investigation and the full disciplinary procedure, Open Media is satisfied that gross misconduct occurred,

the result will normally be summary dismissal without notice or payment in lieu of notice following a Disciplinary Hearing.

Other Offences

The following are examples of offences that would warrant the employees concerned liable to disciplinary action:

- Inefficiency on the job and/or poor standards of workmanship
- Unreasonable lateness or absenteeism or failure to report the absence within a reasonable time as required by rules
- Using foul or obscene language
- Absence from place of work without permission
- Sky larking or carelessness where a possible danger to other employees or damage to the Organisation's property or products may result
- Unauthorised presence in a department other than the employee's normal working area
- Failure to conform with the rules as set out in the Organisation's Rules and Notices
- Failure to conform to the Health and Safety regulations or act in a manner which would put the employee or others at risk.

Please note, the above list is not exhaustive, and the Di-

rector(s) will have the final decision about what constitutes a disciplinary offense.

Appeals Against Disciplinary Action

The employee may appeal to the Director(s) following a disciplinary hearing decision and every effort will be made to resolve the issue. The Director(s) may appoint another senior manager or an independent person to hear the appeal. An employee who wishes to appeal against any disciplinary decision must do so within 5 working days and this must be done in writing. The final decision rests with the Director(s) in the case of dismissal. The appeal will be held within 5 working days. The employee has the right to be accompanied at the hearing by a work colleague or trade union official.

Capability Performance Procedure

Policy Statement

Capability is defined as: performance assessed by reference to skill, aptitude, health OR any other physical OR mental quality.

Open Media will endeavour, wherever possible, to ensure that all employees are aware of, and fully understand, the expectations and standards operating within the organisation. This Capability procedure has been developed to ensure that unsatisfactory performance or failure to achieve the standards set are responded to in a fair and effective manner in accordance with the principles of natural justice.

Levels of Incapability

There are three levels set out in this procedure and these are as follows:

1. Incapability

- A level of incapability which impinges on the ability of the employee to undertake their duties, and which has an impact on service delivery.
- An act/decision at a level within Open Media that has a significant detrimental impact on service delivery or to Open Media.

2. Serious Incapability

- Serious level of incapability which impinges on the ability of the employee to undertake their role and which has a significant impact on service delivery e.g. alcohol or drug abuse.

3. Gross Incapability

- Normally a single incident which has an unacceptable impact on service delivery or to Open Media when it is considered that the matter relates to the capability of the employee, rather than an act of indiscipline.

Informal Action

When a manager with responsibility for initiating action under this procedure (normally the line manager) considers that action should be taken to encourage an employee to improve, they may conduct an informal discussion with the employee.

This will be used to bring to the employee's attention the reasons why it is felt that the employee is not performing satisfactorily, ascertain whether the employee accepts that there is a problem, listen to any explanations or statements made by the employee, and discuss how the employee should seek to improve.

Following the discussion appropriate arrangements will be made to supervise and monitor the employee's continuing performance (perhaps via an action plan), usually by the employee's immediate supervisor, with the employee being required to co-operate in this monitoring process.

Capability Performance Procedure - Stage 1

If, after allowing a reasonable time for improvement, it is considered by the responsible manager that the employee has failed to achieve a satisfactory level of performance, the employee will be required to attend a formal disciplinary hearing to discuss the matter.

The normal disciplinary procedure will apply.

Outcome - Stage 1

If unsubstantiated:

- You will be informed of the decision at the interview and it will be confirmed by letter within five working days.
- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been raised (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in

the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

- You will be issued with a Verbal Warning at the interview and advised that any further breaches of the capability (performance) procedure or departure from the agreed plan may ultimately lead to you being dismissed.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised of the appeal process.

Capability Performance Procedure - Stage 2

If, after a reasonable time has been allowed for improvement, the responsible manager considers that the employee's performance remains less than satisfactory, a further formal disciplinary hearing will take place.

Outcome - Stage 2

If unsubstantiated:

- You will be informed of the decision at the interview and it will be confirmed by letter within five working days.
- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been raised (e.g. possibly involving one or more of training,

general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

- You will be issued with a Written Warning at the interview and advised that any further breaches of the capability (performance) procedure or departure from the agreed plan may ultimately lead to you being dismissed.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g., possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised of the appeal process.

Capability Performance Procedure - Stage 3

If, after a reasonable time has been allowed for improvement, the nominated officer considers that the employee's performance remains less than satisfactory, a further formal disciplinary hearing will take place.

Outcome - Stage 3

If unsubstantiated:

- You will be informed of the decision at the interview and it will be confirmed by letter within five days.
- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been

raised (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

- You will be issued with a Final Written Warning at the interview and advised that any further breaches of the capability (performance) procedure or departure from the agreed plan may ultimately lead to you being dismissed.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised of the appeal process.

Capability Performance Procedure - Stage 4

At stage 4 only a nominated officer together with a representative from HR will review the case.

If, the nominated officer feels that the employee's performance remains less than satisfactory, a further formal disciplinary hearing will be convened.

Outcome - Stage 4

If unsubstantiated:

- You will be informed of the decision at the interview and

it will be confirmed by letter within five working days.

- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been raised (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

One of the following options will be applied:

- You will be issued with a notice of dismissal.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised that any further occurrences of incapability or misconduct may result in dismissal.
- You will be advised of the appeal process.

Equality, Diversity & Inclusion Policy



Introduction

People are what make Open. We embrace a team that is diverse, champion equality and feel passionately about everyone feeling included and proud of their individuality.

Policy Principles

Open takes a zero-tolerance approach to discrimination in any form.

We expect everyone in our team, to take personal responsibility for observing, upholding, promoting, and applying this policy.

We are committed to promoting a working environment that embodies dignity, mutual trust, and respect and one that is free from discrimination, harassment, bullying or victimisation.

We will ensure that every element of Open's internal and external processes and interactions, such as recruitment, promotion and our dealings with suppliers and clients do not treat people less favourably because of their:

Disability; gender, gender identity or gender reassignment status; marital status; race, racial group, ethnic or national origin, or nationality; religion or belief; sexual orientation; age; civil partnership status; pregnancy or maternity; paternity;

or their:

educational background; socio-economic background; caring responsibilities; part-time status; or fixed-term status.

Your individuality

We support any member of our team, new or existing, to be themselves in work and embrace their individuality. We welcome any information you wish to share with us that will help us and the team to support you, such as use of different pronouns.

Shared responsibility

We expect everyone to take responsibility for upholding the principles of this policy and contributing to a positive, inclusive working environment.

We are committed to informing our team about how to do this and we will do this by raising awareness internally through training sessions, encouraging open and safe discussions and leaning on external resources where necessary.

You will be expected to take part in any initiatives relating to Equality, Diversity and Inclusion and respect the wishes of any our team relating to their individuality.

Fair & Equal Pay Policy



Introduction

Open is committed to building an organisation that champions equality, diversity, and inclusivity and we recognise that pay forms a key part of our objectives in this area.

Policy Principles

We are committed to ensuring that equal pay is afforded for like for like work and of equal value and we recognise the unique value that everyone brings to our organisation.

We will go beyond compliance with relevant pay legislation and work to identify and eliminate unfair and unjust practices relating to pay.

Our Practice

We will achieve our objectives relating to fair and equal pay through the development of effective systems, leadership and in collaboration with our workforce, we will:

- Carry out equal pay audits to identify and rectify discrepancies.
- Implement structured pay reviews across the whole workforce and ensure that pay increases are transparent and justified.
- Not discourage discussions around pay among staff or treat any individual unfavourably for doing so.

- Provide training and guidance for managers who are involved in determining pay.
- Carry out benchmarking exercises to determine pay for new roles.
- Ask for feedback on fair pay through annual employee surveys to identify areas for development and encourage staff involvement.

Monitoring and Review

We will continuously monitor and review this policy and our practices to ensure that we are meeting our commitments of fair and equal pay within Open.

We will consider any feedback both internally and externally to identify areas of improvement and that we are continuously moving forward to achieve best practice in this area.

Grievance Policy



Introduction

We hope that any issues or problems you incur during your employment with Open can be resolved informally in the initial instance, however we recognise that sometimes a more formal approach is required where informal action is inappropriate or unsatisfactory.

This policy explains our approach to formal grievances.

Policy Principles

The purpose of this policy is to address any formal grievances you have relating to your employment, your colleagues or management. We will take any grievance seriously and it will be treated confidentially and shared only with those who are involved or need to know.

We recognise the difficulty of grievances for everyone involved and we encourage anyone involved in a grievance procedure to make use of our wellbeing policy and provisions to support you.

The Procedure

To raise a formal grievance, you must do so in writing, clearly outlining the points of the grievance including any relevant information such as dates and witnesses. You will then be invited to a grievance hearing chaired by a manager, who will listen to your case in more detail and commence with an investigation.

If a grievance is raised against you, you will be notified in writing and invited to an investigation meeting and given a fair and proper opportunity to respond to the allegations.

You have the right to be accompanied by a colleague or Trade Union representative of which you are a member at a grievance hearing. This entitlement does not extend to investigation meetings.

Outcomes

The potential outcomes of a grievance process are as follows:

1. Not upheld and no further action taken.
2. Partially upheld.
3. Fully upheld.

In cases where a grievance is partially or fully upheld, the grievance chair may recommend that disciplinary action is taken against the person(s) involved. We will always ask anyone raising a grievance what outcome they wish for or expect, and if appropriate we will aim to deliver this.

The grievance manager will make recommendations when delivering the outcome and we expect those involved to cooperate in achieving a positive resolution.

Right of appeal

You have the right to appeal the outcome of any grievance process. Any appeal will be heard by a senior manager or Director who has had no previous involvement in the case.

Further information

This policy should be read in conjunction with Open's Continued Grievance Policy (Appendix X).

Health & Safety Policy



Introduction

Open is committed to protecting the health, safety and welfare of its employees and the health and safety of other persons who may be affected by its activities.

Policy Principles

We will take steps to ensure that our statutory duties are always met, that health and safety is always a priority and that everyone feels safe within our working environment.

We will ensure that:

- All processes and system are designed to take account of health and safety, and are always properly supervised.
- A member of senior management maintains specific responsibility for health and safety.
- Competent people are appointed to assist us in meeting statutory duties including, where appropriate, specialists outside of the organisation.
- All employees are consulted on matters relating to health, safety, and welfare.
- Adequate facilities and arrangements will be maintained to enable employees to raise issues on health and safety.
- Each employee will be given such information, instruction, and training as is necessary to enable the safe performance of work activities.

- All arrangements are brought to employees' attention and are monitored and reviewed to ensure that they are effective.

Monitoring and review

We will continue to monitor and review our health and safety policies and practices and lean on external suppliers and advisors to ensure that we are meeting our responsibilities at all times.

Annual Leave Policy



Introduction

Taking a break from work is essential to us all and we should all look forward to enjoying downtime, however we please! We strongly encourage you to use all your holiday entitlement to take regular breaks throughout the year and to spend some time focusing on you.

Policy Principles

Open's holiday year runs from 1st January to 31st December.

We encourage you to submit holiday requests with as much notice as possible and ask that for holidays over 5 days, you provide us with no less than 2 weeks' notice and 5 days' notice for anything less than this. This is to help us plan our resources in your absence.

We will endeavour to accommodate any holiday requests and will do what we can to avoid declining any requests. However, there may be times when we have business critical projects or events, or too many people off in your team already, that means that we can't accommodate your request. In the unlikely event that we need to cancel your pre-approved holiday request, we will give you notice amounting to no less than double the number of your planned days.

We don't permit holidays to be carried over into the following holiday year, so encourage you to ensure that you have booked most of your holidays by the middle of the year.

Procedure to follow

All holiday requests must be submitted via our online HR system; My HR Toolkit. Requests will be automatically sent to your line manager and you will receive an email notifying you of whether your request has been approved or not.

You should not take your request as approved until you have received a notification confirming this.

We recommend that you don't book or make any firm plans until your request has been approved.

Holiday Entitlement

Your individual holiday entitlement is outlined in your contract of employment.

Should you decide to leave Open, you will be paid for any accrued, unused leave up to your final working day. If by your leave date, you have used more holidays than you have accrued, this will be deducted from your final salary.

Holiday during sickness absence

You will continue to accrue holiday entitlement during any periods of sickness absence. If a period of absence falls over a pre-approved holiday, you can cancel this if you are unable to take your holiday.

Maternity Policy



Introduction

Firstly, congratulations on your lovely news! We are delighted for you and hope that you are enjoying your pregnancy journey. We appreciate that this can be both an exciting and challenging time for various reasons, so we are here to support you.

Policy Principles

Our aim is to ensure that you feel supported in work during your pregnancy, maternity leave, and eventual return to work, and we will do what we can to make you feel at ease during this exciting, but sometimes challenging time.

For full details, please refer to the Continued Maternity Policy (Appendix X).

Notifying us

As soon as you know that you are pregnant, please notify your manager and as soon as you have it, provide us with your MATB1 form. We ask that you do this so that we have the best interests of you and your baby at the forefront of our mind and can provide or signpost you to any support you might need. Please be assured that this disclosure would be confidential, and a manager would never share your news with anyone other than the CEO without your consent, on your behalf.

Antenatal appointments

Throughout your pregnancy, you will be expected to attend various antenatal appointments, and you will be paid for attending those during working hours and are not expected to make the lost hours up.

We just kindly ask that you give us as much notice as possible. We also understand that for some, these appointments might be difficult for a whole range of reasons, so we are here if you need any support, before or after your appointment.

Maternity leave

All pregnant employees are entitled to the statutory right to take up to 26 weeks maternity leave (OML). By law, you must take a minimum of 2 weeks following the birth of your baby.

The earliest you can start your leave is 11 weeks before the expected week of childbirth.

Maternity pay

Employees with more than 2 years' continuous service by the 14th week before the EWC, will be entitled to receive full pay for the first 5 months of their maternity leave. Any leave thereafter will be paid in accordance with SMP rates. Employees who leave Open Media during maternity leave or within 3 months of returning, will be required to repay any enhanced maternity pay less SMP entitlement.

Supporting you

Our main priority is to support you during and after your pregnancy, as you adjust to the many changes during this time in your life. We will be working continuously to improve the support we offer and would welcome any feedback to help us do this. We recognise that every individual's circumstances are different, so will vary from person to person. Please speak with your line manager or one of our Mental Health First Aid team to see how we can help.

Paternity Policy



Introduction

Firstly, congratulations on your lovely news! We are delighted for you and hope that you are looking forward to becoming a parent.

Policy Principles

Our aim is to ensure that you can take the time off to enjoy your new arrival.

Notifying us

To take paternity leave for a child's birth, you will need to give us at least 15 weeks' written notice before the expected week of your child's birth and:

- The date on which your partner's baby is due.
- The length of paternity leave you wish to take.
- The date on which you wish your paternity leave to start.

Antenatal appointments

Throughout your partner's pregnancy, they will be expected to attend various antenatal appointments. You are entitled to accompany your partner to up to 2 antenatal appointments during work time.

We just kindly ask that you give us as much notice as possible. We also understand that for some, these appointments might be difficult for a whole range of reasons, so we are here if you need any support, before or after your appointment.

Paternity leave

You can take paternity leave if you:

- Have at least 26 weeks' continuous employment ending with the 15th week before the expected week of childbirth.
- Are the biological father of a child, or the spouse, civil partner or partner of the child's mother.
- Have, or expect to have the main responsibility (apart from any responsibility of the mother) for the child's upbringing.

You can take up to 2 weeks paternity leave which can be split into two separate blocks is preferred. Paternity leave can be taken within 52 weeks of the child's birth.

Paternity Pay

All employees eligible for paternity leave as above, will receive up to 2 weeks full pay.

During paternity leave

You will continue to accrue holiday pay as normal and are entitled to receive and access all your normal benefits during this time.

Supporting you

Our main priority is to support you on your journey to parenthood, as you adjust to the many changes during this time in your life. We will be working continuously

to improve the support we offer and would welcome any feedback to help us do this. We recognise that every individual's circumstances are different, so will vary from person to person. Please speak with your line manager or one of our Mental Health First Aid team if you need any further help or support.

Sickness Absence Policy



Introduction

While we hope that our commitment to your health and wellbeing will support your attendance at work, we understand that from time to time, you may be unable to attend work due to reasons of ill-health.

We will endeavour to support every employee throughout periods of sickness absence while managing the operational needs of the organisation.

This policy outlines the procedure to follow if you are going to be absent from work, how we will manage both short and long-term sickness absence and the support we are able to offer you.

Policy Principles

We define short-term sickness absence as any period that lasts less than 3 calendar weeks. Persistent, short-term absence significantly impacts our operational capacity and so if we feel that your absence is becoming frequent, or is forming a pattern, your line manager will meet with you for a discussion to understand how we can support you to improve. A failure to improve your attendance over an agreed time-scale may lead to action under Open's disciplinary policy.

We define long-term sickness absence as any period that lasts more than 3 calendar weeks. We understand that absence of this duration normally relates to an underlying or ongoing health condition, and we will endeavour to support your eventual return to work.

We will likely refer you to Occupational Health for further information.

Procedure to follow

If you are going to be absent from work, please contact your line manager with as much notice as possible, but no less than 1 hour before your expected start time to help us plan our work around your absence.

We will need to understand the reason for your absence, how long you think you will be absent for and any immediate support we can offer.

Your line manager will agree with you when to check back in, but you will need to keep in touch to update us on how you are and when we can expect you back.

Fitness for work notes

If your absence lasts longer than 5 days, you will need to contact your GP and request a note to cover your period of absence. Open will as far as practicable, implement any adjustments that the GP recommends supporting you to return to work safely.

Pay during sickness absence

All employees (who have successfully completed their probation period) are entitled to 2 weeks full pay for sickness absence during a 12-month rolling period. Thereafter, you will receive SSP if eligible.

Further information

This policy should be read in conjunction with Open's Continued Sickness Absence Policy which provides full details of how sickness absence will be managed.

Sickness Absence Policy (Continued)



Short-term absence

We define short-term absence as any period of absence less than 3 calendar weeks.

We understand that occasional sickness can't always be helped, but persistent short-term episodes of absence have a significant impact on our operations, as it is difficult to manage frequent, unanticipated absence within the team.

If we feel that your short-term absence is becoming too frequent, or has a pattern to it (i.e., grouped around a weekend or a holiday), you will be invited to a review meeting to discuss this.

Absence review meetings

We aim to manage short-term absence problems informally initially, to give you the opportunity to improve.

If you are invited to an absence review meeting, the first meeting will be informal, and your line manager will talk through your recent episodes of absence, identify any support you might need and outline the timeframes for you to improve.

Should we not see the expected improvements within the specified timeframes, you will be invited to subsequent review meetings which will form part of a formal absence management process.

At each formal meeting, you will be notified that a failure to improve at each stage will result in a formal disciplinary

warning. Should you continuously fail to improve, the formal warnings may eventually result in your dismissal.

If the reason for your absence is repetitive, we may recommend a referral to Occupational Health to identify whether there are any underlying conditions we need to support you with. If your short-term absence problem relates to an underlying condition, this may be managed under the ill-health capability process rather than the ordinary formal management process.

Long-term absence

We define long-term absence as any period of absence lasting, or expected to last, more than 3 consecutive calendar weeks.

If your absence is considered long-term, your line manager or HR will have weekly (unless otherwise agreed), welfare calls with you. The purpose of these calls is to check to see how you are, obtain any relevant update about your absence, update you about work (if you wish for us to) and ascertain what support we can offer you to help with your recovery back to full health.

With all long-term absence cases, we will recommend a referral to Occupational Health for an assessment. This assessment will provide us with further insight into your condition, how this is managed and recommendations for how we can support your eventual return to work.

We will then arrange to meet with you either at your home, our office, or a mutually suitable venue to discuss

the Occupational Health report with you and to agree next steps with you.

In the unfortunate circumstance of Occupational Health deeming you unfit to return to work in the immediate future, or recommending adjustments that OPEN is unable to accommodate, we may need to manage your absence based on capability that could result in your termination from the organisation on the grounds of ill-health.

Please be assured that this is a last resort, and we will of course endeavour to accommodate recommended adjustments and support your return to work as far as possible. We will never make decisions about your capability for work on the grounds of ill-health without the advice of an independent medical expert and may in some circumstances, request a second opinion.

Mental health-related absence

We understand and appreciate that mental health can be a cause of absence from work and that the types, symptoms, and impact of mental health conditions are wide-ranging and serious.

We promise to manage mental-health related absences with empathy, care, and compassion and in consultation with you so as not to exasperate your condition.

Whether an occasional occurrence or ongoing problem, we will support you and signpost you to the appropriate support where possible. We may suggest that you reach

out to one of our appointed Mental Health First Aiders (MHFA) for additional support. They will also be able to support you when you do return to work. Please be reassured that we wouldn't share confidential information about your health with the MHFA's or anyone else in the organisation other than the CEO and your immediate line manager, without your consent.

Social Media Policy



Introduction

As a Media organisation, we embrace and utilise various social media platforms in our everyday interactions, both internally and externally.

We recognise the important role it plays in our business and keeping us connected, but we also recognise its potential pitfalls and our individual preferences about social media in our personal lives.

Policy Principles

We are committed to using social media as a force for good within Open and making it enjoyable for everyone we interact with.

We want to ensure that social media is being used effectively and responsibly for business purposes, so please take note of the guidelines within this policy.

We also want to be sure that you're comfortable with Open's social media interactions with you and your preferences.

Internal platforms

We use a platform called Slack to communicate with each other internally. We find this helpful as a quick, easy, and informal way to keep the team updated about key information and to ensure that communication between us is fluid.

You will need to read our Slack communication guidelines to familiarize yourself with how we communicate and some of the boundaries we have set to ensure that it is effective for all of us.

Open's social media and you

We regularly post about our team and their achievements on social media platforms, as we love to showcase externally the talent we have within Open.

However, we completely understand that some people may be uncomfortable with this, and we respect your wishes if you prefer not to be included in our outward communications.

Please confirm your preferences for photographs and tagging and we will update our Marketing team.

Social media in your personal life

We are happy for you to shout about the fact that you work for Open and encourage positive engagement with our posts.

However, we ask that you are mindful of how what you post could reflect on Open. If ever you're unsure, just ask your line manager and who can advise you.

As an organisation that takes a zero-tolerance approach to discrimination, victimisation, or harassment in any form; any social media content either posted or interacted with by you that is offensive or goes against our disciplinary policy.

Social media for work

If your role involves posting on social media on behalf of Open, please refer to the guidance notes which your line manager can provide.

Wellbeing Policy



Introduction

The wellbeing of our team is a priority at Open and is a key part of our People Strategy. We recognise the importance of pro-actively managing health and wellbeing and we have a number of initiatives in place with the aim of supporting every individual to do this.

Policy Principles

We will support our team to manage their health and wellbeing in work and this will be embedded into our working practices at Open.

We are committed to ensuring that work does not negatively impact the health and wellbeing of any individual.

We will review and obtain feedback on our approach to wellbeing on an ongoing basis to continuously develop and improve the support we offer, to ensure that it is relevant and meets the needs of our team.

Mental Health support

We take mental health seriously at Open and will do what we can to support anyone suffering with any short or long-term mental health problems and conditions.

We have several appointed mental health first aiders who are trained in offering initial support and can signpost you to any additional resources you need. If you feel that you need any additional support with your mental health and wellbeing, please speak with one of our mental

health first aiders or your line manager in confidence. We're here to help.

Wellbeing Initiatives

We encourage every member of our team to utilise the wellbeing support tools we have in place, which are currently include the following:

Quartely wellness days

Every employee is entitled to take 1 day off work per quarter as a 'wellness' day to focus on your wellbeing. We recognise that sometimes you may need to just take a break, so there is no minimum notice that you need to request this. It is rare that we would decline a request, although we hope you appreciate that if something is business critical, it may be necessary.

Private Medical Care

Following successful completion of probation, every employee has access to private medical care with Aviva. Further details on how to access this will be provided to you after you probation period.

'Blue Monday'

Every January, we say no thank you to what is known as 'blue Monday' (the last Monday of January) by enjoying a day together as a team away from the office (usually in a spa!), to do something that will positively impact our wellbeing.

Carer's Leave Policy



Introduction

At Open Media, we recognise and celebrate the vital role you play as a carer. We are committed to your well-being as you balance the demands of caring responsibilities with your professional life.

Being a Carer

A carer is anyone with caring responsibilities who provides care, assistance and support to any other individual who may be seriously ill or unable to care for themselves.

Whether you're caring for a partner, child, parent, friend or any individual close to you, we want to support you on this journey.

Your Entitlement to Carer's Leave

Carer's are entitled to up to one week of unpaid leave in a 12-month period. Although the leave is unpaid, all other benefits will remain in place. The leave can be taken in blocks, days or half-days. A week of carer's leave is the same duration as your normal working week.

The typical activities that carers undertake are wide ranging, including but not limited to:

- help with personal care and mobility
- managing medication
- practical household tasks
- emotional support and
- help with financial matters or administration

Applying for Carer's Leave

We aim to make the process straight forward. When applying for carer's leave please use the carer's leave request form saved [here](#). Please provide as much notice as possible.

We will do our utmost to accommodate your leave however should we need to adjust due to business demands, we'll work with you to find a suitable alternative.

Our Commitment to You

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have taken, sought to take, or made use of the benefits of carer's leave.

Other types of leave

The statutory right to carer's leave is intended to be for planned and unforeseen caring commitments. If you need to take time off to manage an unexpected or sudden problem relating to a dependant please see our time off for dependants policy.

If you feel that you would benefit from a temporary or permanent change to your working arrangements to help balance your work and caring responsibilities, we encourage you to look at our flexible working requests policy.

Flexible Working Policy



Embracing Flexibility in Our Workplace

At Open Media, we understand that life is a juggling act and we're here to support you in achieving a balance that benefits everyone – making sure our teams are motivated, wellbeing is nurtured, and performance soars.

We understand that everyone has unique circumstances, and we are open to discussing how we can make your work life blend smoothly with your personal life.

Your Right to Request Flexible Working

All employees have the right to apply for flexible working and can make two requests in every 12-month period. While submitting a request isn't a guarantee of flexible working, every request will be met with genuine consideration.

To be eligible to make a request for flexible working:

- You have not made more than two applications in a 12-month period
- If you have made another request, it must have been considered before submitting another

Types of Flexible Working

We will consider requests for any type of flexible working with an open mind.

Examples of flexible working include:

- Hybrid working (time split between workplace and working remotely)
- Part-time working
- Homeworking
- Flexible hours
- Compressed hours

How to Apply for a Flexible Working Request

If you want to make a request for flexible working you can do so in writing (via letter or email) and specify the following:

- The date of the request
- The changes that you are seeking to your terms and conditions of employment
- The date on which you would like the change to come into effect
- A statement that this is a statutory request
- If and when you have made a previous application for flexible working
- If you have made a previous request, when you made that application

The terms and conditions you can request to change only relate to hours, start/finish times and place of work.

A flexible working form can be found [here](#).

Discussing Your Request

We promise to give your request the attention it deserves and if we need to talk it over, we'll arrange a meeting within two months to understand better and explore possibilities together. Feel free to bring a colleague to support if you wish.

Making the Decision

If your requested change of working arrangements is accepted, the new terms and conditions that apply will be permanent.

If we can't grant your request, it is because of a significant business reason, and we'll clearly explain why no later than 14 days after the meeting unless an extension has been agreed. We will always aim to find alternative solutions that could work for you.

Embracing Change: Trial Periods and Appeals

We may need to test the waters with a trial period if we are not sure what impact it will have on the business. During this time the change to your terms and conditions of employment will be temporary.

If your request isn't approved, you have the right to appeal within 14 days of receipt of Open Media's decision and a meeting will be arranged. We will then confirm the outcome in writing within a further 14 days and this decision will be final.

Let's work together to make Open Media a place where flexibility helps us all do our best work.