

CLOSE RELATIONSHIP POLICY



Document Control

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Risk(s) procedure is designed to manage	Diversity & Inclusion, Conflict of Interest
Task and department(s) that procedure applies to	Group Wide
Reference to related procedure(s)	Data Protection Policy – Staff Records Pinnacle Pet Group Code of Conduct Equal Opportunities Harassment & Bullying Disciplinary Procedure Conflicts of Interests Policy

1. Scope

This policy relates to workers who are in close personal relationships at work including but not limited to those who:

- live together;
- share a property;
- rent, mortgage or have other similar financial commitments together;
- are spouse/partners;
- are close blood relatives (siblings, parents, grandparents, children)
- are other relations (extended family such as aunts, uncles, cousins, nieces), and any other individual with whom the worker is in a close personal relationship (close friendship, business association outside the Company).

Here-in after the above groupings will be collectively referred to as "Close Relationship(s)".

2. Introduction

The Company seeks to ensure that its Policies and Procedures promote equality of opportunity to all workers and potential members of staff. It recognises that there are workers who may be involved in a Close Relationship(s) with another worker. It also recognises that Close Relationships may form between workers during the course of their employment. The Company will manage such situations sensitively and ensure that any action taken is not unfair or discriminatory; however, the Company will explore, in discussion with the workers concerned, the issues which may arise and ensure they are managed effectively.

The Company seeks to put in place procedures to ensure there is no conflict of interest in the appointment of such individuals or in their subsequent line management arrangements when working for the Company. The Company seeks to put proper emphasis on the effect of private behaviour in the workplace.

The aim of the policy is to safeguard the working relationships of all workers. It is intended to avoid any possible conflict of interest or accusation of favouritism or prejudice. The Company wants to ensure that all workers feel confident of fair treatment without fear that Close Relationships will influence their or other workers treatment or broader working relationships. The Company will operate this policy in accordance with the Company's Equal Opportunities Policy. The Company also wishes to ensure that any working relationships between individuals do not indirectly impinge on work performance or pose a risk to the business (reputational, financial and/or operational).

3. Standards

The maintenance of the highest professional and ethical standards is essential in the pursuit of best practice within the Company. In this context, and in order to avoid any conflict of interest, it is important that workers avoid situations where a Close Relationship with another individual could influence professional judgement or decisions.

In order to promote the Company's commitment to the boundaries of the professional role of workers, it must be fully recognised that the Company expects that all workers will maintain these boundaries and respect these obligations.

4. Procedure

Any worker in a Close Relationship with another worker must declare the relationship(s) in line with the Company's Conflict of Interest Policy. A record of Registered Conflicts of Interests will be stored in accordance with the Company's Data Protection Policy.

Registered Conflict of Interests in relation to "Close Relationships" will be reviewed by the HR and Compliance. The Company will take measures which are appropriate and equitable to address the conflict of interest. This may, but will not necessarily, include on either a permanent or temporary basis:

- Attributing business/work relationships to another worker;
- The individual worker being excluded from taking part in any aspect of the following procedures which involve the individual with whom they have a Close Relationship:
 - recruitment or selection (including the interview process);
 - appointment;
 - probation;
 - evaluation of jobs and grading;
 - performance/salary review;
 - promotion/transfer;
 - training and development;
 - redundancy;
 - Grievance or Disciplinary procedures;
 - references.
- Reassigning a worker to another area of work or an alternative location as is reasonable in the particular circumstances.

If a worker is required/asked to give their views/make a decision on any aspect of the employment/potential employment of an individual with whom they have a close relationship, they must declare this.

The Company may then either require that worker to withdraw from the process or allow the worker to continue whilst taking into account the potential conflict of interest.

Furthermore, workers must also be aware that:

- they must declare an interest prior to and on each and every occasion that the potential conflict arises;
- no decision relating to an individual with whom a worker has a Close Relationship can be made by them without the prior approval and consent of HR.
- no individual in a Close Relationship with the recruiting manager may be employed without the prior approval and consent of HR.

For further information on Conflicts of Interest and the disclosure of the same, please refer to the [Conflict of Interest Policy](#).

Failure to disclose a close relationship coupled with participation in any of the situations described in this policy, will be investigated and handled in accordance with the Company's [Disciplinary Procedure](#).

5. Recruitment

All applicants are required to disclose in writing or via email to HR during the recruitment process details of a Close Relationship with any worker employed by the Company. Applicants will be asked to state the name and relationship to the worker. Failure to disclose such a relationship may disqualify the applicant.

Where the recruiting manager decides an applicant should be appointed despite a declared relevant Close Relationship, the appointment must be reviewed by HR before the appointment is made. To avoid any subsequent debate, HR should maintain a record of the decision made.

6. Relationship breakdown

Where a Close Relationship breaks down and workers remain in the same area of work or team with a potential negative impact on the business, the Company will address the matter sensitively with the workers involved and may require one or both individuals to move to another team or area of work temporarily or permanently. Should the need to move workers occur, the decision will be reviewed by HR before the decision is confirmed.

7. General

The Company reserves the right to change, alter, amend, substitute or remove this policy without notice of any such alteration, amendment, substitution or removal. The Company shall act reasonably in all circumstances.