

STARGLAZE WINDOWS AND CONSERVATORIES LIMITED
EQUAL OPPORTUNITIES POLICY

Introduction

Starglaze Windows and Conservatories Limited is a Company committed to a policy of Equality Opportunity in all its employment practices and procedures. It is committed to the elimination of discrimination on the grounds of sex, marital status, sexual orientation, race, colour, nationality, creed, ethnic or national origins, age and disability. This policy also includes a commitment to develop a climate free from harassment as it is recognised that every member of staff has a right to work without fear of harassment or victimisation. The Company is aware of the problems associated with harassment and is committed to providing an environment in which all individuals can operate effectively, confidently and competently. Any complaint brought to the attention of Management will be investigated promptly and appropriate action taken.

1. What is Harassment?

There is no clear definition. Harassment comprises of any unwelcome statements or actions of a racial or sexual nature, on the grounds of disability, or any other actions which are offensive to the recipient. Harassment includes victimisation, intimidation, mockery and bullying. The following list includes examples of what may be considered to be harassment, however, it should be noted that the list is by no means exhaustive. Additionally, it should be noted that no two people are identical and what one person may find to be acceptable may constitute harassment to another person. It is for the person on the receiving end of any behaviour to decide whether he or she finds it unacceptable.

a. Physical Harassment

This includes unnecessary touching, physical threats, assault, insulting or abusive behaviour or gestures.

b. Verbal Harassment

This includes propositions or remarks, lewd comments, innuendos and abusive language.

c. Non-Verbal Harassment

This includes the display of suggestive pictures, photographs, pornographic material, racially offensive written or visual material and graffiti.

d. Unacceptable Conduct

This includes bullying, intimidating and ridicule.

2. Why a Separate Harassment Policy is Needed

As stated above, everyone has the right to work in an environment free from harassment. The purpose of this policy is to raise awareness of harassment and to provide a procedure to enable employees to challenge it.

General

- All complaints will be thoroughly and sympathetically investigated
- An employee who brings a complaint of harassment will not suffer victimisation for having brought such a complaint
- An employee may be accompanied by a friend or colleague at any stage of the investigation
- It is important that anyone who believes that they have suffered from harassment should keep detailed notes of the incidents in question. The notes should be made as soon as possible after the event and should include dates, times, places, the name of the person responsible for the harassment, details of the incident, names of any witnesses and the action taken by the victim and whether it was reported to Management.

STAGE I

Whenever possible, employees who believe that they have been subjected to harassment should tell the person responsible that they find their behaviour offensive and ask them to stop. If you are too embarrassed to confront the harasser yourself, you could ask someone else to do it for you such as a trusted colleague, or a member of Management.

Even though you have informally warned the harasser yourself, you should report the matter to your Supervisor so that a record of your informal warning can be made.

STAGE 2

This stage may be used if you consider Stage I to be inappropriate and/or your informal attempts to resolve the situation have been unsuccessful.

You should put your complaint to your Supervisor. If however your complaint is about him or her, the complaint should be put to the person next in line of authority.

The person receiving the complaint will then arrange for it to be recorded in writing and logged in a dedicated record book within 48 hours.

3.

STAGE 3

Depending upon the circumstances of each particular case, the Company will assign two Managers of the Company to investigate the allegations. One officer will be wholly independent of both the complainant and the alleged harasser and the second officer will so far as is possible be of the same sex or race as the complainant.

Depending upon the circumstances of the particular case, the Company may deem it necessary to suspend the alleged harasser on full pay pending a full investigation. This action will be taken at the sole discretion of the Company.

The investigating officers will then follow the procedure set out below:-

- (a) Interview the complainant
- (b) Interview the alleged harasser to inform him/her of the nature of the complaint his or her rights to be accompanied by a work colleague, the possibility of disciplinary action and his/her right to respond fully to the allegations made
- (c) Interview witnesses and prepare statements or interview notes
- (d) The complainant and the alleged harasser will be given copies of all statements or interview notes as soon as practicable
- (e) Only relevant facts will be considered during the investigation
- (f) The investigating officers will jointly decide whether the complaint is substantiated and if so, will consider what further action is required

STAGE 4

Following the full investigation, the Company will decide at its discretion as to whether disciplinary action is necessary. Any such action will be implemented immediately in accordance with the Company's disciplinary procedure. Should the alleged harasser feel aggrieved, it will be open to him/her to seek redress through the grievance procedure and/or appeals procedure.

The complainant will be told whether or not disciplinary action has been taken, but will not be told precisely the nature of the action. If the complainant feels aggrieved, it will be open for him/her to seek redress through the grievance procedure.

Appropriate records will be made upon the personnel files of the alleged harasser and the complainant.

4.

TIMESCALES

The Company will aim to complete the investigation within 14 working days of the complaint being received. For various reasons it may not be possible to keep within this timescale. Where that is the case, the complainant and the alleged harasser will be kept informed of any need for an extension of time and the likely timescale for completion.

This policy is designed for your protection and to ensure your welfare at work. If you are in any doubt as to its terms and effects, you may discuss it in strict confidence with the Operations Director or Company Secretary.

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