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EQUAL OPPORTUNITIES, HARASSMENT AND BULLYING POLICY

1 Introduction & purpose

The Company considers all forms of discrimination to be unacceptable in the workplace. The Company is committed to providing equal opportunities throughout employment, including the recruitment, reward, development and promotion of staff.

The company is committed to ensuring that no employees receive less favourable treatment or is unlawfully discriminated against on grounds of: disability, gender, sex, sexual orientation, marital status, race, colour, religion, age, nationality or ethnic origin.

All employees will be made aware of the provisions of this policy and all are required to ensure that the policy is observed in all workplaces.

The company will not ignore, or treat lightly, grievances or complaints from employees on the assumption that the individual is oversensitive about discrimination.

2 Recruitment and Promotion

The company will take all reasonable steps to recruit, employ and promote employees on the basis on ability, skill and qualification.

The company will avoid making any requirements when recruiting employees that would exclude a proportion of a particular sex, racial group or background.

3 Employment

The company will not discriminate against any individuals on the basis of disability, gender, sexual orientation, sex, marital status, race, colour, religious convictions, age, nationality or ethnic origin.

4 Selection

All job applicants & when people are considered for advancement will be treated equally.

Decisions made will be based on the individuals: ability to carry out the role, skills, knowledge, attitude, suitable experience, & qualifications (where specifically required I.E: CSCS Card holders)

5 Training, Facilities and Benefits

All employees will be provided with the appropriate training & development to meet the job role & their individual needs regardless of their race, sex, colour, age, marital status, nationality, ethnic origin, disability or sexual orientation.

We will also take positive steps to ensure that part time staff have access to such development to meet the above listed requirements

The company will make no distinction based on such grounds between the training, facilities and benefits it provides to employees.

6 Monitoring & Review

The Company will ensure that our team are aware of the Policy, with periodic checks made to ensure that all aspects of the policy are effective. This will be done by consulting with our staff & asking their opinion.

From time to time, the Company will review its selection criteria for recruitment, training and promotion to ensure they do not constitute or could lead to unlawful discrimination.

This Policy will also be reviewed by Company Management on an annual basis, unless required earlier.

7 Responsibilities

All Company Managers and Supervisors are responsible for ensuring that all aspects of the policy are being followed. As such all Managers and Supervisors must know what is unacceptable behaviour and take preventative measures to ensure it does not occur.

If the Manager or Supervisor becomes aware of such behaviour, he or she must respond in accordance with the **Company's Discrimination and Harassment Procedure below**.

All complaints or events witnessed must be treated seriously; the failure of Managers or Supervisors to carry out their duties in respect of this Policy & procedures could lead to disciplinary action being taken.

8 Discrimination, Harassment and Bullying at Work Procedure

Owing to its very nature, harassment and discrimination is not often witnessed. Victims, afraid of not being believed, are sometimes reluctant to come forward. Harassment is often a case of one employee's word against another's and the perpetrator may well be in a more senior position. The victim may also fail to come forward because of embarrassment and/or fear of subsequent victimisation.

If anyone feels they are being harassed, they should be encouraged to come forward. The Company undertakes to deal with all cases promptly, fairly and sympathetically. We recognise that staff who complain in good faith must be protected against victimisation. Furthermore, it is a criminal offence to use threatening, abusive or insulting words or behaviour, or to display any writing, sign or other visible depiction which is threatening, abusive or insulting, with the intention of causing someone distress, alarm or harassment.

Harassment may take the form of behaviour or comments which are objectionable, or which make the recipient feel threatened, humiliated or patronised.

Reasons for harassment can include:

- race, ethnic origin, nationality or skin colour;
- gender or sexual orientation;
- religious or political beliefs;
- medical conditions, disability or appearance;
- willingness to challenge harassment, leading to victimisation.

While we are all different, it is important to understand that it is the recipient's feelings that determine whether certain behaviour or comment constitutes harassment. We need to be sensitive to other people's views at all times.

Examples of possible harassment include:

- sending salacious, offensive or abusive messages or pictures via internal or external mail or via fax or email;
- leering, whistling or making sexually suggestive or insulting gestures;
- uninvited and unwelcome physical contact;
- verbal and written harassment through jokes, offensive language, gossip and slander.

This list is intended as a guide and is not exhaustive.

Everyone has the right to complain if they believe they are being harassed. All claims will be taken seriously and will be promptly, confidentially and fully investigated by the Company. The Supervisor and the Director conducting the investigations will have no connection with the allegation and your rights and those of the alleged harasser will be protected at all times.

Informal Procedure

It is an important feature of the procedure that, except in cases of alleged serious harassment, or discriminatory treatment the informal procedure should be used, at least at first. Much harassment is unintentional and can often be resolved by speaking informally to the person creating the problem. If unable to do this, a written request for the harassment to cease may resolve the situation. If preferred, a colleague or your supervisor can be asked to speak to the person concerned on behalf of others.

All are encouraged to keep note of times and nature of all incidents. Wherever possible, get witnesses to confirm events.

Formal Procedure

Where informal methods fail to stop the harassment or serious harassment or discrimination occurs, you may bring a formal complaint. The procedure is as follows:

(a) Make the complaint in writing, in confidence, to a supervisor, giving as much information as possible. If it is not possible to involve the supervisor, raise the matter with a Director.

(b) Within five working days of receiving a written complaint, or as soon as reasonably practicable, an informal and confidential meeting will be arranged with the supervisor (or director) to determine whether there is a case to be heard, and to ensure that the alleged victim understands how the formal complaints procedure will operate.

(c) Provided everyone at the meeting agrees to go ahead with the formal procedure, the supervisor (or director) will carry out a thorough investigation as quickly as possible, maintaining confidentiality at all times.

(d) Written confirmation of whether or not the complaint has been upheld will be given to both parties no later than five working days after the investigations have been concluded.

(e) If it is decided there is evidence that harassment has occurred, the harasser will be offered the opportunity to defend or explain his or her actions in accordance with the Company's disciplinary procedure.

(f) Malicious or deliberately false complaints of harassment will be considered a disciplinary offence and the originator of the accusation will be offered every opportunity to defend or explain their actions in accordance with the Company's disciplinary procedure.

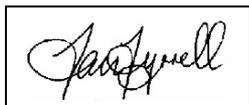
(g) Any employee who receives a disciplinary warning or is dismissed for harassment may appeal against the penalty in accordance with the Company's appeals procedure.

Suspension from work/home leave

A thorough investigation of an allegation of harassment or other discriminatory acts may take time to complete. In such circumstances the Company may require the either party involved to remain at home while the investigation takes place. In either case, the absence will be on full basic pay. Any such suspension or home leave does not imply guilt or blame and will be for as short a period as possible.

This Policy & the procedures herein have been adopted for use & to be followed by everyone working on our behalf.

Signed:



Ian Tyrrell (Commercial Director)

Dated: 2nd April 2013

Scheduled date of next review of this Policy: April 2014 unless required earlier