



DAYSPRING
PLACEMENT SOLUTIONS LIMITED

Discrimination Policy

Discrimination Policy Information Pack

June 2020

DAYSPRING DISCRIMINATION POLICY

Purpose

DAYSPRING believes in respecting the dignity of every employee and expects every employee to show respect for all of our colleagues, customers, and vendors. Respectful, professional conduct furthers our mission, promotes productivity, minimizes disputes, and enhances our reputation.

This policy forbids any discrimination or unwelcome conduct that is based on an individual's race, colour, religion, gender, national origin, age, disability, ancestry, medical condition, marital status, veteran status, citizenship status, sexual orientation, or any other protected status of an individual or that individual's associates or relatives. DAYSPRING is committed to providing a work environment that is free of unlawful discrimination, including harassment that is based on any legally protected status. We will not tolerate any form of discrimination or harassment that violates this policy.

Coverage

This policy absolutely forbids any employee, supervisor, partner, officer, director, vendor, client, or agent of DAYSPRING to discriminate against or harass any Company employee, applicant or participant.

Prohibited Conduct

The conduct prohibited by this policy, whether verbal, physical, or visual, includes any discriminatory employment action and any unwelcome conduct that affects someone because of that individual's protected status. Among the types of unwelcome conduct prohibited by this policy are epithets, slurs, negative stereotyping, intimidating actions and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. Even where the conduct is not sufficiently severe or pervasive to constitute actionable harassment, DAYSPRING discourages any such conduct in the workplace.

Sex Harassment

Sex harassment is a problem that deserves special mention. Harassing conduct based on gender often is sexual in nature but sometimes is not. Our policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature. Any unwelcome conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in harassment and the person being harassed are of the same or are of different genders.

Unwelcome sexual advances, requests for sexual favours, and other verbal, physical or visual conduct based on sex constitute unlawful sex harassment when

- (1) submission becomes an implicit or explicit term or condition of employment,
- (2) submission to or rejection of the conduct is used as the basis for any employment decision, or

(3) the conduct has the purpose or effect of unreasonably interfering with a person's work performance or creating an intimidating, hostile or offensive working environment.

DAYSRING forbids harassment based on gender regardless of whether it rises to the level of a legal violation. Examples of gender-based harassment forbidden by DAYSRING include

- (1) offensive sex-oriented verbal kidding, teasing or jokes;
- (2) repeated unwanted sexual flirtations, advances or propositions;
- (3) continued or repeated verbal abuse of a sexual nature;
- (4) graphic or degrading comments about a person's appearance or sexual activity;
- (5) offensive visual conduct, including leering, making sexual gestures, the display of offensive sexually suggestive objects or pictures, cartoons or posters;
- (6) unwelcome pressure for sexual activity;
- (7) offensively suggestive or obscene letters, notes or invitations; or
- (8) offensive physical contact such as patting, grabbing, pinching, or brushing against another's body.

Employee Responsibility

Everyone at DAYSRING can help ensure that our workplace is free from prohibited discrimination or harassment. Everyone is expected to avoid any behaviour or conduct that could reasonably be interpreted as prohibited discrimination or harassment; no employees, not even the highest ranking people at DAYSRING are exempt from the requirements of this policy. Every employee is expected to inform any person in the workplace whose conduct the employee finds unwelcome.

Any manager or supervisor who is aware of conduct inconsistent with this policy or who receives a report of conduct inconsistent with this policy is to report immediately to the Executive Director. Every employee who reports harassment should make every effort to make that report directly to the Executive Director.

Reporting Procedures

If you feel you have experienced or witnessed any conduct that violates this policy, you are to immediately notify the Executive Director or follow the DAYSRING grievance and complaints procedure for employees (see DAYSRING grievance and complaints procedure). This policy does not require reporting harassment or discrimination to any person who is creating the harassment or discrimination.

DAYSRING Response

All reports describing conduct that is inconsistent with this policy will be investigated promptly. DAYSRING may put reasonable interim measures in place, such as a leave of absence or a transfer, while the investigation takes place. DAYSRING will take further appropriate action once the report has been thoroughly investigated. That action may be a conclusion that a violation occurred, or DAYSRING might also conclude, depending on the circumstances, either that no violation of policy occurred or that the Company cannot conclude whether or not a violation occurred.

Where an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, then DAYSRING will take corrective action, including discipline up to and including dismissal, as is appropriate under the circumstances, regardless of the positions of the parties involved. DAYSRING may discipline any employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If the person who engaged in harassment is not employed by DAYSRING, then we will take whatever corrective action is reasonable and appropriate under the circumstances.

Procedures

Consistent with this policy against workplace discrimination and harassment, DAYSRING maintains posters on bulletin boards that refer to legal definitions of discrimination and harassment. Those posters identify government agencies to contact for information on how and when to file administrative claims. Using DAYSRING complaint process does not keep an employee from filing a claim with a government agency.

The time period for a federal complaint is 180 or 300 days from the harassment. The time period for filing a claim continues to run during DAYSRING investigation. Our policy provides for immediate notice of problems to DAYSRING officials listed above, so that we may resolve any problems without waiting for any legal proceedings to run their course.

Policy Against Retaliation

DAYSRING forbids that any employee treat any other employee or former employee or applicant adversely for reporting discrimination or harassment, for assisting another employee or applicant in making a report, for cooperating in a discrimination or harassment investigation, or for filing an administrative claim with a government agency. All employees who experience or witness any conduct they believe to be retaliatory should immediately follow the reporting procedures stated above.

Confidentiality

In investigating and in imposing any discipline, DAYSRING will attempt to preserve confidentiality to the extent that the needs of the situation permit.

Acknowledgment

All DAYSRING employees have a personal responsibility to conduct themselves in

compliance with this policy and to report any observations of conduct inconsistent with this policy. If you have any questions about this policy, then please contact the office of the Executive Director immediately

I have read and understood this policy and agree to comply with all of it.

Name

Signature

Date: _____