

ANTI-HARASSMENT AND BULLYING POLICY

Statement of policy

Brenmar committed to fostering a safe, respectful, and inclusive working environment free from harassment, bullying, victimisation, and discrimination.

We recognise that everyone has the right to be treated with dignity and respect. Any behaviour considered to be harassment or bullying is a serious disciplinary offence and will not be tolerated, regardless of who the perpetrator is or where the behaviour takes place.

Scope and applicaton

This policy applies to all individuals working for or on behalf of Brenmar. This includes, but is not limited to:

- All employees (permanent, fixed-term, part-time).
- Sub-contractors and Agency workers.
- Consultants, suppliers, and other stakeholders
- Job applicants

This policy applies to conduct:

- During working hours, on any of our sites or office.
- Outside of work, if it is work-related including training courses, work related social events or through work related communications).
- Via digital and social media platforms if it relates to colleagues, clients, or the company.

Definitions

Harassment (Equality Act 2010 Amendment Regulations 2023)

Harassment is defined as unwanted conduct that is related to a Protected Characteristic and has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that individual.

The **Protected Characteristics** under the Equality Act 2010 are:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race (including colour, nationality, and ethnic or national origins).
- Religion or belief
- Sex
- Sexual Orientation

Sexual Harassment is specifically defined as unwanted conduct of a sexual nature that has the same effect as described above, or when a person is treated less favourably because they have rejected or submitted to such

conduct.

Bullying

Bullying is not defined in UK law but is generally characterised as offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power through means that undermine, humiliate, or injure the recipient.

Unlike harassment, bullying does not need to be related to a Protected Characteristic, but it is equally unacceptable.

Responsibilities

Directors and Managers

- Implementing, monitoring, and enforcing this policy consistently.
- Ensuring all employees and contractors are aware of this policy.
- Taking all complaints seriously, ensuring prompt, fair, and confidential investigation.
- Taking appropriate disciplinary action where a complaint is upheld.
- Protecting employees and workers from victimisation for making a complaint in good faith.

Employees and Contractors

- Treating colleagues, contractors, and clients with dignity and respect
- Ensuring their behaviour does not constitute bullying or harassment.
- Cooperating fully and honestly with any investigation under this policy.
- Challenging unacceptable behaviour if they feel safe to do so, or reporting it immediately.

Procedure for raising a complaint

Informal Resolution

If you feel comfortable, you may wish to resolve the issue informally first. This could involve:

- Speaking directly to the person involved and explaining that their behaviour is unwelcome and asking them to stop.
- Asking your manager, or a colleague to speak to the person on your behalf.

Formal Complaint Procedure

If the informal approach is inappropriate, unsuccessful, or if the behaviour is serious, you should raise a formal complaint immediately.

Reporting: Report the incident to Louise Hinckley or another Director.

Submission: The complaint should be put in writing, detailing:

- The date(s) and time(s) of the incident(s).
- The name(s) of the individual(s) involved.
- The nature of the behaviour.
- The names of any witnesses.

Investigation: Brenmar will promptly launch a thorough, impartial, and confidential investigation, in line with the Company's Disciplinary and Grievance procedures.

Outcome: Following the investigation, Brenmar will communicate the findings and any resulting actions to all parties involved.

Disciplinary action

If an investigation concludes that harassment or bullying has occurred, disciplinary action will be taken against the

perpetrator.

- In cases of minor misconduct, this may lead to a formal warning.
- In cases of serious misconduct, or where the behaviour is judged to be Gross Misconduct, this may result in summary dismissal (dismissal without notice).

Victimisation (treating someone unfairly because they have made a complaint or assisted in an investigation) is also a serious disciplinary offence.

This policy will be reviewed and updated annually or following any significant changes in legislation or company structure.

Signed



Mark Harvey

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