ELOVADE

Anti-Sexual Harassment Policy

November 2024

1. Policy Statement

1.1 Brigantia Partners Limited is committed to preventing harassment, discrimination and victimisation, to ensure that all members, staff and third parties, are treated, and treat others, with dignity and respect.

Sexual Harassment will not be tolerated under any circumstances. Complaints will be taken seriously and addressed promptly, irrespective of role or status within the company.

1.2 This Policy sets out Brigantia's expectations of behaviour for all employees, contract workers, consultants, casual workers, volunteers and all other third-party individuals.

1.3 It also responds to the Worker Protection (Amendment of Equality Act 2010) Act 2023 which introduced new legislative requirements for employers.

2. Policy Statement

2.1 At Brigantia we aim to prevent all incidents of sexual harassment, respond promptly to any incidents that arise and take action to effect long term change by:

- Educating all staff about sexual harassment and their role in developing a culture free from all forms of harassment, including sexual harassment.
- Fostering a work environment that supports the dignity and respect of all and is free from any form of discrimination, bullying harassment, and violence, including gender-based violence.
- Where harassment does occur, providing a process and procedure for dealing with all incidents to ensure it is properly managed and dealt with.
- Learning from any prior incidents to create and improve the current environment be free from all forms of harassment.
- Monitoring our progress in achieving a workplace free from harassment; and
- Ensure that we continuously improve to create a work environment free from harassment and build this into our culture.

3. Expected Behaviour

3.1 All employees, workers, consultants, volunteers and third-party individuals can expect to:

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- be treated with dignity, respect and courtesy;
- be able to work, free from unfair treatment, sexual harassment or victimisation; and

3.2 All employees, workers, consultants, volunteers and third-party individuals can expect to:

- familiarise themselves with the content of this policy;
- treat all employees, workers, consultants, volunteers and third-party individuals with dignity, respect and courtesy;
- contribute towards a positive working culture;
- challenge or report unacceptable behaviour;
- be mindful of others when expressing views; and
- cooperate fully with investigations into sexual harassment.

4. Unacceptable Behaviour

4.1 Sexual harassment constitutes discrimination and is illegal activity under the Equality Act 2010. For the purposes of this policy, "sexual harassment" is defined in line with legislative prohibition as unwanted behaviour of a sexual nature.

Any behaviour which may contribute to the creation of an intimidating, hostile, degrading, humiliating or offensive environment, whether it was intended or not. This behaviour may be implicit or more subtle in nature.

The following, though not an exhaustive list, may constitute sexual harassment:

Physical conduct:

- Unwanted physical contact including, but not limited to; patting, pinching, stroking, kissing, hugging, fondling or inappropriate touches of any nature.
- Physical violence, including but not limited to; sexual assault.
- Physical contact, eg. Touching or pinching.
- The use of job-related threats or rewards to solicit sexual favours.

Verbal conduct:

- Comments on a worker's appearance including, age, private life, etc.
- Sexual comments, stories, innuendo and/or jokes.
- Sexual advances.
- Repeated or unwanted social invitations for dates or physical intimacy.
- Insults based on the sex of an individual.
- Sending sexually explicit messages, by any means.

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- Condescending or paternalistic remarks.

Non-verbal conduct:

- Display of sexually explicit or suggestive material.
- Intrusion by pestering, spying, following etc.
- Sexually suggestive or obscene gestures.
- Whistling
- Leering

Victimisation

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do an act which is protected under discrimination and harassment laws. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation.

The protected acts are:

a) making a claim or complaint under the Equality Act 2010 (for example, for discrimination or harassment)
b) helping someone else to make a claim by giving evidence or information in connection with proceedings under the Equality Act 2010
c) making an allegation that someone has breached the Equality Act 2010, or
d) doing anything else in connection with the Equality Act 2010.

Examples of victimisation may include:

a) Failing to consider someone for promotion because they have previously made a sexual harassment complaint
b) Dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint
c) Excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

Brigantia Partners Limited reserve the right to terminate any agreement, contract or business relationship based upon a confirmed instance of Sexual Harassment. Such termination will be done at the sole discretion of Brigantia.

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Review Process

This policy is maintained and reviewed annually by the Brigantia senior management team.

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