

## Policy Statement

DVC Roofing & Building Ltd is committed to preventing and eradicating personal harassment and bullying in all its forms and will not tolerate any form of unfair discrimination and/or intimidatory acts. If bullying or harassment is found to have taken place, following an investigation, then the disciplinary procedure will be followed.

## Introduction

All complaints of discrimination will be sensitively investigated and, if proven, will result in disciplinary action for the perpetrator.

Both the complainant and the alleged perpetrator shall be entitled to be accompanied by a work colleague of their choice to any meetings convened for the purpose of dealing with a complaint under these procedures or under the disciplinary procedures.

**Bullying** is any persistent behaviour or attack on someone else's dignity, directed against an individual, which is intimidating, offensive or malicious and which undermines the confidence and self-esteem of the recipient. Bullying can range from extremes, such as violence, to less obvious forms like ignoring someone. Whatever the form, it will be unwanted behaviour, which is unwelcome and unpleasant. It is a question of whether they feel intimidated, or the actions of others disrupt harmonious working.

**Harassment** is a particular form of bullying. Bullying becomes harassment when it has a focus such as gender, disability, race, age, sexual orientation, ethnic/national origin or religion. In general terms, it can be described as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive and which detracts from the working environment of the employees.

Because the effects of bullying and harassment are so damaging, any behaviour, which contravenes the right of all employees to be treated with dignity and respect, will not be accepted. Where appropriate, disciplinary action (including dismissal for gross misconduct) will be taken.

## Malicious Complaints

If a complaint is proven to be malicious, disciplinary action will be taken against the complainant.

## Confidentiality and Support

The matter must be treated with confidentiality at all stages. This applies to both the person making the complaint and to the person who is the subject of the complaint.

## Employees Responsibilities

- To be aware that their behaviour, although it may be unintentional, could cause offence
- To behave in a way which does not harass another person and to avoid behaviour which has been brought to their attention as causing offence
- To discourage such behaviour in other employees
- To support a colleague who is being bullied or harassed and to encourage him/her to deal with their concerns in accordance with the policy
- To recognise that a breach of the policy will be dealt with in accordance with the disciplinary procedure and could result in the termination of employment
- To acknowledge that all complaints will be taken seriously and handled sensitively and in the strictest confidence
- To cooperate with their employer

*'The inaction of a witness could be construed as silent agreement or support for the alleged harasser.'*

## Informal Approach

In the first instance, it is always advisable for the employee to try and resolve the matter informally. If the recipient does not feel able to approach the perpetrator themselves, they could consider asking the Company Director to accompany them or make the approach on their behalf.

### **Making a Formal Complaint**

When or if the informal approach fails or when you feel that the harassment or bullying is of a very serious nature you must bring the matter to the attention of the Company. If possible, you should keep notes of the harassment or bullying, including the date, time and location, so that the formal complaint can be investigated.

The complainant should make a formal complaint, in writing, which will be acknowledged within 3 working days, to the Director, who will arrange for an investigation to take place.

The complainant should state, where possible, the following:

- The name of the alleged harasser
- The nature of the bullying or harassment
- Dates and times when bullying or harassment took place
- Names of any witnesses to any incidents
- Any action already taken to stop the harassment

### **The Investigation**

A formal complaint will be investigated thoroughly and during the investigation all possible actions will be taken to separate you from the alleged harasser or bully.

The investigating officer(s) will consider the evidence and decide what action, if any, is required under the Disciplinary Procedure. In the event of dismissal, the report will be used as evidence, along with the verbal testimony of the investigating officer(s).

Each of the parties will be informed of the outcome of the investigation at a meeting and will be given the opportunity to comment. The outcome should be confirmed, in writing, within 7 days of that meeting.

If the report concluded that the allegation is well founded, the harasser or bully will be subject to disciplinary action, in accordance with the Company's disciplinary procedure. If you bring a complaint of harassment or bullying you will not be victimised for having brought the complaint.

If, however, after a full and fair investigation, the Company has grounds to believe that the complaint was brought with malicious intent, you will be subject to disciplinary action, in accordance with the Company's disciplinary procedure.

### **Right of Appeal**

If the complainant is unhappy with the outcome of the investigation they may appeal against the decision to the Managing Director within 14 days of being notified of the outcome. The Company's appeals procedure applies to decisions made under this harassment and bullying policy.

This Policy will be reviewed no later than 12 months from the date below.

Signed for and on behalf of DVC Roofing & Building Ltd

Mr. Scott Lewthwaite



**Designation:** Managing Director

**Date:** 6<sup>th</sup> January 2026