

Equality, Diversity & Inclusion

1. Policy Statement

Bremner & Co is committed to promoting equality, valuing diversity, and fostering an inclusive workplace in which all people are treated with dignity and respect. We recognise that a diverse workforce brings different perspectives, skills, and experiences that strengthen our organisation and the service we provide.

This policy applies to all employees, workers, contractors, consultants, volunteers, and job applicants. It covers all aspects of employment including recruitment, pay and benefits, terms and conditions, training, development, promotion, grievance, disciplinary matters, dismissal, and redundancy.

Bremner & Co is also committed to ensuring that in providing goods, services, and facilities to customers and the public, no one is treated less favourably on account of a protected characteristic.

2. Legal Framework

This policy is underpinned by and complies with the following UK legislation:

Legislation	Relevance to this policy
Equality Act 2010 Equality Act 2010	Primary legislation prohibiting discrimination on the basis of protected characteristics; imposes duties on employers to make reasonable adjustments.
DPA 2018/UK GDPR - Data Protection Act 2018	Monitoring data is voluntary, anonymised where possible, held securely and processed in line with the data protection policy
Worker Protection (Amendment of Equality Act 2010) Act 2023 - Worker Protection (Amendment of Equality Act 2010) Act 2023	Introduced a proactive employer duty to take reasonable steps to prevent sexual harassment in the workplace.
Employment Rights Act 1996 - Employment Rights Act 1996	Governs core employment rights including unfair dismissal and rights to written statements of employment.
Employment Rights Act 2025 Employment Rights Act 2025	Sexual harassment to become a protected whistleblowing disclosure

Human Rights Act 1998 - Human Rights Act 1998	Incorporates Convention rights into UK law, including the right to private life and freedom from discrimination.
Rehabilitation of Offenders Act 1974 - Rehabilitation of Offenders Act 1974	Limits disclosure requirements for spent convictions; relevant to fair and lawful recruitment practice.
Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000 - The Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000	Protects part-time workers from less favourable treatment compared to comparable full-time workers.
Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002 - The Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002	Protects employees on fixed-term contracts from less favourable treatment compared to permanent employees.
Protection from Harassment Act 1997 - Protection from Harassment Act 1997	Creates civil and criminal liability for harassment; relevant where workplace harassment may also constitute a criminal offence.

This policy will be updated whenever there are relevant changes in legislation or statutory guidance that come into force. [Employment Rights Act 2025](#)

3. Protected Characteristics

Under the Equality Act 2010 - [Discrimination and the Equality Act 2010 - Discrimination at work - Acas](#). Bremner & Co will not unlawfully discriminate against any person because of a protected characteristic. The nine protected characteristics are:

The nine protected characteristics under the Equality Act 2010

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)

- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

4. Forms of Discrimination

Bremner & Co will not tolerate any of the following forms of unlawful discrimination:

- **Direct discrimination:** treating someone less favourably because of a protected characteristic.
- **Indirect discrimination:** applying a provision, criterion, or practice that puts people with a protected characteristic at a particular disadvantage without objective justification.
- **Harassment:** unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- **Disability:** Disability discrimination includes unfavourable treatment linked to a person's disability, such as disability-related absence. [Equality Act 2010 Section 15](#)
- **Sexual harassment:** sexual harassment (conduct of a sexual nature) and harassment related to a protected characteristic. [Equality Act 2010 Section 26](#). Note: under the [Worker Protection \(Amendment of Equality Act 2010\) Act 2023](#), employers have a proactive duty to take reasonable steps to prevent sexual harassment [What sexual harassment is - Sexual harassment - Acas](#)
- **Victimisation:** treating someone less favourably because they have made, or are suspected of making, a complaint or allegation, or have supported someone else who has done so.
- **Associative discrimination:** treating someone less favourably because of their association with a person who has a protected characteristic.
- **Perceptive discrimination:** treating someone less favourably because they are believed to have a protected characteristic, even if they do not.
- **Failure to make reasonable adjustments:** failing to make reasonable changes to remove disadvantages faced by disabled people.

5. Our Commitments

5.1 Inclusive workplace culture

Bremner & Co is committed to:

- Creating a working environment free from bullying, harassment, victimisation, and unlawful discrimination, in which the dignity and respect of all individuals is upheld.
- Recognising and valuing the individual differences and contributions of all staff.
- Actively promoting equality, diversity, and inclusion as good business practice, not merely a legal obligation.

- Fostering a culture in which people feel safe to raise concerns without fear of retaliation.

5.2 Recruitment and selection

All recruitment decisions will be based on merit, using fair and objective criteria. Job advertisements, person specifications, and selection processes will be reviewed to ensure they do not contain unjustifiable requirements that could disadvantage candidates with protected characteristics. Reasonable adjustments will be made for disabled applicants at all stages of the recruitment process.

5.3 Pay, terms, and conditions

All employees will receive equal pay for equal work or work of equal value, regardless of any protected characteristic. Pay and benefit structures will be applied consistently and reviewed regularly to identify and address any disparities.

5.4 Training and development

Training, development, and promotion opportunities will be made equally available to all employees. Managers will actively support employees in developing their full potential, and training needs will be identified and addressed without unlawful discrimination.

5.5 Reasonable adjustments for disabled people

Bremner & Co has a duty under the [Equality Act 2010 - Discrimination and the Equality Act 2010 - Discrimination at work - Acas](#) to make reasonable adjustments for disabled employees, workers, and job applicants.

We will engage proactively with individuals to understand and, wherever reasonably practicable, accommodate their needs. This applies throughout employment, including at the recruitment stage, during performance or absence management, and in connection with any disciplinary or grievance process.

6. Responsibilities

6.1 Chief Executive Officer / Partner

- Has overall responsibility for ensuring this policy is implemented, reviewed, and communicated throughout the organisation.
- Ensures that adequate resources and training are provided to support compliance with this policy.
- Leads by example in promoting an inclusive workplace culture.

6.2 All managers and supervisors

- Are responsible for applying this policy consistently and fairly within their area of responsibility.
- Must not discriminate in any decision they make relating to employment, including recruitment, pay, promotion, training, or disciplinary matters.

- Must take prompt and appropriate action to address any concerns of discrimination, harassment, or bullying brought to their attention.
- Are required to complete equality and diversity training as provided by Bremner & Co.

6.3 All employees and workers

- Must treat colleagues, clients, customers, visitors, and others with dignity and respect at all times.
- Must not engage in or encourage bullying, harassment, victimisation, or unlawful discrimination.
- Should report any concerns about discrimination, harassment, or bullying to the Chief Executive Officer/Partner or if a concern involves the Chief Executive/Partner to the Project Team Co-ordinator trish@bremnerco.com in the first instance.

Important: All employees and workers should be aware that they may be personally liable for acts of discrimination, harassment, or victimisation carried out in the course of their employment, even where Bremner & Co is also held liable as the employer.

7. Prevention of Sexual Harassment

Bremner & Co takes its proactive duty under the [Worker Protection \(Amendment of Equality Act 2010\) Act 2023](#) seriously. We are committed to taking reasonable steps to prevent sexual harassment in the workplace, including harassment by third parties such as clients or suppliers - [What sexual harassment is - Sexual harassment - Acas](#)

Steps taken include, but are not limited to:

- Providing training and awareness-raising for all staff on what constitutes sexual harassment and how to report it.
- Ensuring that managers are equipped to recognise and respond to reports of sexual harassment promptly and sensitively.
- Including prevention of sexual harassment as a standing agenda item in relevant reviews of this policy and supporting training.
- Encouraging a speak-up culture in which individuals feel safe to raise concerns without fear of retaliation.

Bremner & Co recognises that sexual harassment and other forms of harassment may be perpetrated not only by colleagues but also by third parties, including clients, customers, suppliers, contractors, and members of the public. Bremner & Co will take reasonable steps to protect employees from third-party harassment, including by:

- Making clear to third parties that harassment of any kind will not be tolerated.
- Ensuring employees know how to report incidents involving third parties and that such reports will be taken seriously.
- Taking appropriate action where third-party harassment is reported, which may include challenging the behaviour directly, ending a business relationship, or escalating the matter as appropriate.

- Considering the risk of third-party harassment as part of ongoing workplace risk assessments.

Line managers are responsible for assessing situations where employees may be at risk of third-party harassment and for taking preventative action proportionate to that risk.

Sexual harassment may, in some circumstances, also constitute a criminal offence (for example, under the [Sexual Offences Act 2003 - Sexual Offences Act 2003](#) or the [Protection from Harassment Act 1997](#)). Where this is suspected, it may be necessary to refer the matter to the police in addition to taking internal action.

An employers duty is being strengthened and the policy will be updated when the provisions come into force. [Employment Rights Act 2025](#)

8. Reporting and Raising Concerns

Any employee who believes they have been subjected to, or has witnessed, discrimination, bullying, harassment, or victimisation should report this as soon as possible to the Chief Executive Officer/Partner, or if a concern involves the Chief Executive/Partner to the Project Team Co-ordinator trish@bremnerco.com

All complaints will be:

- Taken seriously and treated with sensitivity and confidentiality.
- Investigated promptly and impartially in line with the Bremner & Co Grievance Procedure - [Grievance procedure v2.docx](#)
- Where they constitute misconduct by the alleged perpetrator, referred to the Bremner & Co Disciplinary Procedure - [Disciplinary procedure v2.docx](#)

Particularly serious complaints, including those amounting to gross misconduct where allegations are upheld following the disciplinary procedure, the outcome may include summary dismissal. [Acas Codes of Practice | Acas](#)

Where a complaint has potential criminal dimensions (for example, assault, stalking, or serious harassment under the Protection from Harassment Act 1997 [Protection from Harassment Act 1997](#)) Bremner & Co may refer the matter to the police.

Non-retaliation: Anyone who raises a concern or supports someone else who has raised a concern in good faith will be protected from any detriment or retaliation. Retaliation against a complainant or witness will itself be treated as misconduct.

Employment tribunal rights: Nothing in this policy or in the use of Bremner & Co's internal procedures affects an employee's right to bring a claim to an employment tribunal. Claims of discrimination must generally be submitted within the statutory time limit, currently three months less one day of the act complained of - [Plan to Make Work Pay and Employment Rights Act: timeline update - GOV.UK](#)

9. Monitoring and Effectiveness

Bremner & Co will monitor the operation of this policy to ensure it is working effectively and achieving its objectives. This will include:

- Monitoring the composition of the workforce by reference to age, sex, ethnic background, disability, religion or belief, and sexual orientation, where employees voluntarily provide this information.
- Monitoring data is voluntary, anonymised where possible, held securely and processed in line with the data protection policy. [Data Protection Act 2018 Article 9; Schedule 1](#).
- Reviewing the outcomes of recruitment, promotion, training, grievance, and disciplinary processes to identify any patterns of potential disparity.
- Reviewing this policy and any supporting action plan annually, and updating them to reflect changes in law, best practice, or the needs of the business.
- Considering and acting on any issues identified through monitoring.

10. Training and Awareness

Bremner & Co will take reasonable steps on appropriate equality, diversity, and inclusion training to all staff as part of induction and on an ongoing basis. This will include:

- Awareness of this policy and employees' rights and responsibilities under it.
- Training for line managers on fair and non-discriminatory decision-making, and the prevention of sexual harassment and the employer's proactive duty.
- Refresher training where there are relevant changes in law or practice, or where specific issues are identified.
- Electronic records will be kept on line managers who have completed the training.

11. Related Policies and Documents

This policy should be read alongside:

- [Disciplinary procedure v2.docx](#)
- [Grievance procedure v2.docx](#)
- [Harassment & Bullying Policy v2.docx](#)
- [Data Protection policy.docx](#)
- [Health and Safety Policy.docx](#)

Further guidance on equality legislation is available from:

- Equality & Human Rights Commission (EHRC) [Homepage | EHRC](#)
- ACAS - [Acas | Making working life better for everyone in Britain](#)
- GOV.UK - [Discrimination: your rights: Types of discrimination \('protected characteristics'\) - GOV.UK](#)