

ANTI-HARASSMENT AND BULLYING POLICY

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1. Policy statement

- 1.1 We are committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect. We recognise that harassment or bullying can occur both in and outside the workplace, such as on business trips or at work-related events or social functions.

2. About this policy

- 2.1 The purpose of this policy is to set out a framework for line managers to deal with any harassment or bullying that occurs by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.
- 2.2 This policy does not form part of any contract of employment or contract to provide services, and we may amend it at any time subject to agreement.

3. Who does this policy apply to?

- 3.1 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

4. Who is responsible for this policy?

- 4.1 The board of directors (**Board**) has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Managing Director. Suggestions for change should be reported to the Head of the HR Department.
- 4.2 Line managers have day-to-day responsibility for this policy, and you should refer any questions about this policy to them in the first instance.
- 4.3 This policy is reviewed annually by the Managing Director.
- 4.4 Staff should disclose any instances of harassment or bullying of which they become aware to their line manager.

5. What is harassment?

- 5.1 Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile,



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degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

- 5.2 It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 5.3 Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.
- 5.4 Harassment may include, for example:
- (a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
 - (b) continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
 - (c) sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
 - (d) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
 - (e) racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
 - (f) outing or threatening to out someone as gay or lesbian;
 - (g) offensive emails, text messages or social media content; or
 - (h) mocking, mimicking or belittling a person's disability.
- 5.5 A person may be harassed even if they were not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

6. What is bullying?

- 6.1 Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.
- 6.2 Bullying may include overbearing and intimidating levels of supervision or inappropriate derogatory remarks about someone's performance. However,



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legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

7. **If you are being harassed or bullied: informal steps.**

7.1 If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to your line manager who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel unable to speak to your line manager because the complaint concerns him or her, then you should speak informally to the HR Department. If this does not resolve the issue, you should follow the formal procedure below.

7.2 If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your line manager informally for confidential advice.

7.3 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below and/or refer to our Grievance Procedure in the Employee Handbook.

8. **Raising a formal complaint**

8.1 If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your line manager. If the matter concerns your line manager, you should submit it to the HR Department.

8.2 Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

8.3 As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

9. **Formal investigations**

9.1 We will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint, or the investigation should not be told about it.

9.2 We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be



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accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.

- 9.3 Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser or bully who may also be accompanied by a colleague or trade union representative of their choice to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.
- 9.4 Where your complaint is about someone other than an employee, such as a customer, supplier or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.
- 9.5 We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser or bully.
- 9.6 It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
- 9.7 At the end of the investigation, the investigator will submit a report to a senior manager. The senior manager will arrange a meeting with you, usually within a week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting. A copy of the report and the senior manager's findings will be given to you and to the alleged harasser.

10. Action following the investigation

- 10.1 If the senior manager considers that harassment or bullying has occurred, prompt action will be taken to address it.
- 10.2 Where the harasser or bully is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.
- 10.3 Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be



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appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.

- 10.4 Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under our Disciplinary Procedure.

11. Appeals

- 11.1 If you are not satisfied with the outcome you may appeal in writing to your line manager, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you.

- 11.2 We will hold an appeal meeting, normally within one week of receiving your written appeal. Where practicable, the appeal hearing will be conducted by a senior manager who has not been previously involved in the case and is senior to the individual who conducted the previous meeting. They may ask anyone previously involved to be present. You have the right to bring a colleague or trade union representative to the meeting.

- 11.3 We will confirm our final decision in writing, usually within one week of the appeal hearing. This is the end of the procedure and there is no further appeal.

12. Protection and support for those involved

- 12.1 Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

- 12.2 If you believe you have suffered any such treatment you should inform your line manager. If the matter is not remedied, you should raise it formally using our Grievance Procedure or this procedure if appropriate.

13. Confidentiality and record-keeping

- 13.1 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.

- 13.2 Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

13.3

Rob Bailey, Director, 05-09-2026