



Anti-Harassment & Bullying Policy

Introduction

We are committed to providing a working environment free from harassment and bullying and ensuring all individuals are treated, and treat others, with dignity and respect.

This policy covers harassment or bullying which occurs at work and outside the workplace e.g. on business trips, at work-related events or social functions. It covers bullying and harassment by staff and also by third parties such as clients, suppliers or visitors to our premises.

Manager and individual responsibility

Managers are responsible for ensuring all individuals engaged by the business understand the standards of behaviour expected of them, and to take action when behaviour falls below expectations. Individuals should disclose any instances of harassment or bullying to their immediate manager or, where appropriate, a senior manager or the HR team.

Questions about this policy and requests for information on dealing with bullying or harassment should be directed to the HR team.

What is harassment?

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, degrading, humiliating or offensive environment for them. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past. Note that a single incident may amount to harassment.

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.

Harassment may include, for example:

- Unwanted physical conduct or "horseplay", including touching, pinching, pushing & grabbing;
- Continued suggestions for social activity when clear that such suggestions are unwelcome;
- Sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips & images sent by phone or posted on the internet);
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- Racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- Outing or threatening to out someone as gay or lesbian;
- Offensive e-mails, text messages or social media content; or
- Mocking, mimicking or belittling a person's disability.

This list is intended as a guide and is not exhaustive.

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.

What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power resulting in a person feeling vulnerable, upset, humiliated, undermined, threatened or excluded. It can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- Physical or psychological threats
- Overbearing and intimidating levels of supervision
- Inappropriate derogatory remarks about someone's performance

This list is intended as a guide and is not exhaustive

Legitimate, reasonable and constructive criticism of an individual's performance or behaviour, or reasonable instructions given to individuals in the course of their work, is not considered as bullying.

The informal procedure

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 that their behaviour is not welcome or makes you uncomfortable.

If you don't feel comfortable doing so, you should speak to your manager or the HR team, who can provide confidential advice and assistance in resolving the issue informally.

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

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.

Raising a formal complaint

If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your manager, whose role is to achieve a solution wherever possible. If the matter concerns that person, you should refer it to a more senior manager or the HR team.

Your written complaint should set out full details of the conduct in question, including the name of the alleged 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.

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

Formal investigations

We will investigate complaints in a timely and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. It should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.



We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. The investigator will arrange further meetings with you as appropriate throughout the investigation.

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. This should not be taken as an inference of wrongdoing and no judgement will be made until the investigation has been completed. The investigator will also meet with the alleged harasser or bully and they have a right to be told the details of the allegations against them, so that they can respond.

Your complaint may be about someone other than an employee, such as a client, supplier or visitor. In such cases, 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.

We will consider any reasonable 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 in order to avoid or minimise contact with the alleged harasser or bully.

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.

At the end of the investigation, the investigator will report their findings to the senior manager nominated to consider the complaint. The senior manager will arrange a meeting with you, as soon as reasonably possible, in order to discuss the outcome and what action (if any) may be taken.

Action following the investigation

If the senior manager considers that harassment or bullying has occurred, appropriate action will be taken to address it.

Where the harasser or bully is an employee the matter will be dealt with under our Disciplinary Procedure. If the harasser or bully is a third party such as a client, supplier or other visitor, we will consider what action would be appropriate and how best to manage any ongoing working relationship between you and the person concerned.

It may be 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.

Any individual 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.

Protection and support for those involved

Individuals who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result.

Any employees found to have retaliated against or victimised someone in this way will be subject to action under our Disciplinary Procedure. If the person who has done so is a third party such as a client, supplier or other visitor, we will consider what action would be appropriate.



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

Confidentiality and Record keeping

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 for employees, or some other form of appropriate action for third parties such as clients, suppliers or other visitors.

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.