



ANTI-BULLYING & HARASSMENT POLICY & PROCEDURE

Introduction

The Company recognises that harassment and victimisation is unlawful under the Equality Act 2010. As such, harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable and will not be tolerated.

Personal harassment takes many forms ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. For the purposes of this policy, it also includes bullying.

Bullying is understood to be targeted and persistent offensive, intimidating, malicious or insulting behaviour and can include the abuse or misuse of power to undermine, humiliate, denigrate or injure the recipient.

Whatever form it takes, personal harassment is always taken seriously and is unacceptable.

We recognise that personal harassment can exist in the workplace, as well as outside, and that this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating and unpleasant working environment.

We seek to ensure that the working environment is sympathetic to all our employees. The aim of this policy is to inform employees of the type of behaviour that is unacceptable and provide employees who are the victims of personal harassment with a means of redress.

We recognise that we have a duty to implement this policy and all employees are expected to comply with it.

Examples of personal harassment

Personal harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one employee towards another and examples of harassment include:

- insensitive jokes and pranks;
- lewd or abusive comments;

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- deliberate exclusion from conversations;
 - displaying abusive or offensive writing or material;
 - abusive, threatening or insulting words or behaviour;
 - name-calling;
 - picking on someone or setting them up to fail;
 - exclusion or victimisation;
 - undermining their contribution/position;
 - demanding a greater work output than is reasonably feasible;
 - blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.

Examples of sexual harassment

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:

- lewd or abusive comments of a sexual nature such as regarding an individual's appearance or body;
- unwelcome touching of a sexual nature;
- displaying sexually suggestive or sexually offensive writing or material;
- asking questions of a sexual nature; or
- sexual propositions or advances, whether made in writing or verbally.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature. Whether less favourable treatment occurs as a result will be examined broadly and includes areas such as blocking promotion and refusal of training opportunities or other development opportunities.

Examples of victimisation

Victimisation takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment. Furthermore, any employee who supports or assists another employee to raise a complaint is also subjected to victimisation if they are treated unfavourably.

Third party harassment

We operate a zero-tolerance policy in relation to harassment perpetrated against one of its employees by a third party, such as a customer or visitor. All employees are encouraged to report all instances of harassment that involve a third party in line with our reporting procedure, as outlined below under 'Complaining about harassment and/or bullying'.

If we find that the allegation is well-founded, we will take steps we deem necessary in order to remedy this complaint. This can include, but is not limited to:

- warning the individual/customer about the inappropriate nature of their behaviour, and (where appropriate) requesting that they modify their behaviour;
- banning the individual/customer from company premises;
- refusing to work with the individual/customer (either immediately or after continued harassment after having given the individual/customer an opportunity to modify their behaviour); or
- reporting the individual's actions to the police.

In addition to this, we will endeavour to take all reasonable steps to deter and prevent any form of harassment from third parties taking place.

Employee responsibilities

We require our employees to behave appropriately and professionally at all times during the working day, and this may extend to events outside of working hours that are classed as work-related such as social events. Employees should not engage in discriminatory, harassing or aggressive behaviour towards any other person at any time.

Any form of harassment or victimisation may lead to disciplinary action up to and including dismissal if it is committed:

- in a work situation;
- during any situation related to work, such as a social event;
- against a colleague or other person connected to the employer outside of a work situation, including on social media; or
- against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

A breach of this policy will be treated as a disciplinary matter.

Employer responsibilities

We are responsible for ensuring all employees understand the rules and policies relating to the prevention of harassing and bullying behaviour at work and during work-related social events. We will promote a professional and positive workplace whereby managers are alert and proactively identify areas of risk and incidents of harassment, sexual harassment and bullying.

We will also take into account aggravating factors, such as abuse of power over a more junior colleague, when deciding what disciplinary action to take.

Where an incident is witnessed, or a complaint is made under this policy, we will take prompt action to deal with this matter. All incidents will be deemed serious and dealt with in a sensitive and confidential manner.

Complaining about harassment and/or bullying

Complaints relating to harassment and/or bullying should be raised formally with the employee's line manager or the People Team and followed up in writing via email.

Employees should refrain from using chat channels or other informal means for such matters.

Amendments to this policy

This policy is non-contractual and may be amended from time-to-time in line with changes to legislation and best practice.