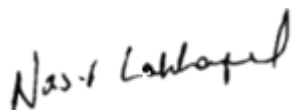
	Policy: HR01	
	V.7	
	Date: 13/02/2026	Page 1 of 4
Title: Anti Bullying and Harassment Policy		

Version	Action	Author	Verifier	Comments	Date
01.0	Original	Nasir Lakhanpal	Simon Fitzgerald	Creation	08/12/2019
02.0	Reviewed	Simon Agar	Ruth Exelby	Review	17/03/2021
03.0	Reviewed	Ruth Exelby	Susan O'Neill	Review	17/03/2022
04.0	Reviewed	Bob Pinner	Dale Ball	Review	20/02/2023
05.0	Reviewed	Nasir Lakhanpal	Jodi Pearson	Review	20/06/2024
0.60	Reviewed	Chris Haresign	Jodi Pearson	Review	20/06/2025
0.70	Full New Policy	Donna Lawson	Donna Lawson	Full new policy from original version	13/02/2026
				Next Review	13/02/2027

Authorised by



Nasir Lakhanpal Head of HR and Facilities

ABOUT THIS POLICY

1.1 Purpose

Our aim is to provide a working environment that respects the rights of each employee and where colleagues treat each other with respect. Any behaviour that undermines this aim is unacceptable.

We do not tolerate any form of harassment or bullying under any circumstances. While implementing and upholding the policy is the duty of all of our managers and supervisors, all employees have a responsibility to ensure that harassment does not occur.

We recognise 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 totally 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 deplore all forms of personal harassment and 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.

This policy covers all areas of the Organisation's organisation. *[Optional]* This includes overseas sites, subject to any applicable local laws which impose any additional requirements on the Organisation.

We recognise that we have a duty to implement this policy and all employees are expected to comply with it. We will also endeavour to review this policy at regular intervals in order to monitor its effectiveness.

1.2 PRINCIPLES AND PROCEDURES

The following procedure has been designed to inform employees about the type of behaviour that is unacceptable and provides employees who are the victims of harassment and bullying with a means of redress. We will not tolerate harassment or bullying of:

- Job applicants
- Employees
- Contractors
- Agency workers
- The self-employed
- Ex-employees

This policy also applies to work related functions which are held outside of normal working hours, either on or off our premises, such as Christmas parties, leaving celebrations, working lunches, etc.

2 WHAT IS HARASSMENT?

2.1 Definition

Harassment is unwanted conduct related to a relevant protected characteristic (an area covered by discrimination legislation) which has the purpose or effect of violating an individual's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive working environment for them.

Harassment will also occur where a colleague is treated less favourably because he or she has rejected or refused to submit to sex-based harassment, sexual harassment or gender reassignment harassment.

Where it cannot be established that there was an intention to offend, conduct will only be regarded as violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment if, taking all the circumstances into account it would be reasonable to come to that conclusion.

People can be subjected to harassment on a wide variety of grounds. Some examples are:

- Sex-based (purely because of gender) or sexual (sexual in nature)
- Sexual orientation
- Trans-sexualism (gender reassignment)
- Being married or a civil partner
- Race, nationality, ethnic origin, national origin or skin colour
- Disability itself or a reason relating to it
- Age
- Employment status, e.g. part-time, fixed term
- Membership or non-membership of a trade union
- Carrying out health and safety duties
- Religion or religious beliefs or lack of either
- Deeply held personal beliefs or lack of them
- Political beliefs
- Criminal record
- Health, e.g. AIDS/HIV sufferers
- Physical characteristics
- Social class
- Willingness to challenge harassment – being ridiculed or victimised for raising a complaint

Harassment is normally characterised by more than one incident of unacceptable behaviour, particularly if it reoccurs, once it has been made clear by the victim that they consider it offensive. One incident may constitute harassment, however, if it is sufficiently serious. Harassment on any grounds, including the above, will not be tolerated.

Harassment at work is unlawful under the Equality Act 2010.

The Company, together with any managers or supervisors who fail to take steps to prevent harassment or investigate complaints may be held liable for their unlawful actions and be required to pay damages to the victim, as will the employee who has committed the act of harassment. There is no limit to the compensation that can be awarded in employment tribunals for acts of harassment.

We will also be liable for harassment that comes from a third party (e.g. a customer or supplier) if that harassment occurs on at least two occasions, the organisation is aware that it has happened and does nothing to stop it happening.

Harassment on any grounds is also a criminal offence, primarily under the Protection from Harassment Act 1997. This means that colleagues who suffer harassment may contact the police, in the case of harassment from fellow employees or harassment by third parties. Those found guilty face fines or periods of imprisonment of up to two years.

Additionally, an employee harassed by a colleague may sue that colleague personally for the damage and distress caused. We may be held vicariously liable under the Protection from Harassment Act for any harassment perpetrated by an employee whenever the behaviour in question is closely connected to the employment relationship.

3 EXAMPLES OF HARASSMENT

Employees must recognise that what is acceptable to one employee may not be acceptable to another.

Examples of harassment include:

- Verbal – crude language, open hostility, offensive jokes, suggestive remarks, innuendoes, rude or vulgar comments, malicious gossip and offensive songs.
- Non-verbal – wolf-whistles, obscene gestures, sexually suggestive posters/calendars, pornographic material (both paper-based and generated on a computer, including offensive screensavers), graffiti, offensive letters, offensive e-mails, text messages on mobile phones and offensive objects.
- Physical – unnecessary touching, patting, pinching or brushing against another employee's body, intimidating behaviour, assault and physical coercion.
- Coercion – pressure for sexual favours (e.g. to get a job or be promoted) and pressure to participate in political, religious or trade union groups, etc.
- Isolation or non-cooperation and exclusion from social activities.
- Intrusion – following, pestering, spying, etc.

3.1 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
- 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.

3.2 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

- 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.

3.3 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.

3.4 Third party harassment

The Organisation operates a zero tolerance policy in relation to harassment perpetrated against one of its employees by a third party, such as a client/customer or visitor to the organisation. All employees are encouraged to report any and all instances of harassment that involve a third party in line with our reporting procedure, as outlined below.

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 about the inappropriate nature of their behaviour
- banning the individual from organisation premises
- reporting the individual's actions to the police.

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

4 WHAT IS BULLYING?

4.1 Definition

Bullying is a gradual wearing down process comprising a sustained form of psychological abuse that makes victims feel demeaned and inadequate. Bullying is defined as offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, which has the purpose, or effect of intimidating, belittling and humiliating the recipient, leading to loss of self-esteem for the victim and ultimately self-questioning his or her worth in the workplace and society as a whole.

4.2 Examples of bullying

Workplace bullying can range from extreme forms such as violence and intimidation to less obvious actions, like deliberately ignoring someone at work. These can be split into two categories:

The obvious:

- Shouting or swearing at people in public and private.
- Persistent criticism.

- Ignoring or deliberately excluding people.
- Persecution through threats and instilling fear.
- Spreading malicious rumours.
- Constantly undervaluing effort.
- Dispensing disciplinary action that is totally unjustified.
- Spontaneous rages, often over trivial matters.

The less obvious:

- Withholding information or supplying incorrect information.
- Deliberately sabotaging or impeding work performance.
- Constantly changing targets.
- Setting individuals up to fail by imposing impossible deadlines.
- Levelling unfair criticism about performance the night before an employee goes on holiday.
- Removing areas of responsibility and imposing menial tasks.
- Blocking applications for holiday, promotion or training.

The actions listed must be viewed in terms of the distress they cause the individual.

It is the perceptions of the recipient that determine whether any action or statement can be viewed as bullying.

5 THE IMPACT OF HARASSMENT AND BULLYING

Harassment and bullying can lead to illness, absenteeism, an apparent lack of commitment, poor performance and resignation.

The damage, tension and conflict that harassment and bullying creates should not be underestimated. The result is not just poor morale, but higher labour turnover, reduced productivity, divided teams, poor service and poor product quality.

Public image can be badly damaged when incidents of harassment and bullying occur, particularly when they attract media attention. This can result in a loss of customers.

6 ENFORCEMENT

Any harassment or bullying will be classed as gross misconduct, for which employees may be summarily dismissed.

All employees will be informed of the policy towards harassment and bullying at induction training and through communication and awareness programmes. It will be stressed that all complaints of harassment will be treated seriously.

We expect all managers and supervisors to ensure that this policy and procedure is adhered to at all times and expects all employees to respect the dignity of their colleagues. The policy will be regularly monitored by the Human Resources Director to ensure that it is achieving its aims and that managers and employees are confident about its application.

7 TRAINING, COMMUNICATION AND AWARENESS

We recognise that a written policy is not sufficient to eliminate harassment and bullying. Prominent and regular communication, training and awareness sessions are important to ensure that all employees:

- Understand our commitment to prevent harassment and bullying.
- Understand their responsibilities and role in the process.
- Know how to seek advice and guidance.
- Know how to make complaints and are confident they will be handled effectively.

We are committed to communicating the policy effectively through:

- Training and awareness programmes for all staff at all levels.
- Briefings for employee and trade union representatives.
- Posters.
- Notices on staff notice boards.
- A section in the staff handbook.
- Management guides.
- Employee guides.
- Counsellors/advisers who can guide employees through the policy and procedures.
- Articles in the staff magazine.
- Inclusion in briefing meetings.
- Induction.

8 RESPONSIBILITIES

8.1 Employee Responsibilities

The Organisation requires its employees to behave appropriately and professionally at all times during the working day, and this may extend to events outside of working hours which 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
- 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 by will be treated as a disciplinary manner

8.2 Employer Responsibilities

The Organisation will be responsible for ensuring all members of staff, including seniors and those within management positions, 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, the Organisation will take prompt action to deal with this matter. All incidents will be deemed serious and dealt with in a sensitive and confidential manner. procedures

9 ADVICE

We recognise the sensitive nature of harassment and bullying. Employees who believe they are being harassed or bullied may wish to discuss their situation before deciding what action to take. We operate an open-door policy to discuss workplace problems and employees can discuss the matter with their manager on an informal basis.

We recognise that this may not always be appropriate in the circumstances, however. If this is the case, employees can discuss the situation with the next higher level of management or with a member of the Human Resources Department.

Advisers will:

- ensure the conversation remains confidential as far as possible;
- listen sympathetically;
- help individuals consider objectively what has happened;
- discuss what outcome the individual would wish to see;
- draw attention to available procedures and options;
- inform the individual of the legal liabilities involved;
- help weigh up the alternatives, but without pressure to adopt any particular course;
- assist the individual in dealing with the situation, if they ask for help.

Confidentiality will be maintained as far as possible. If an employee decides not to take any action to deal with the problem and the circumstances described are very serious, however, we reserve the right to investigate the situation. It has an overall duty of care to ensure the safety of all employees who may be adversely affected by the alleged harasser's/ bully's behaviour.

9.1 Solutions

It is for the individual to decide which route to take in solving any problem that has occurred. There are two types of solution available – informal and formal.

9.2 Informal

Employees can choose to solve the matter themselves by approaching the harasser or bully, telling him or her that their behaviour is unwelcome and that it must stop. Otherwise a formal complaint will be made using the procedure outlined below.

If victims would find it difficult or embarrassing to raise the issue directly with the person creating the problem, support can be sought from a work colleague who can accompany the victim when speaking to the harasser or bully.

A third option, is that the victim can put his or her views in writing to the harasser or bully, telling him or her that their behaviour is unacceptable and that it must stop.

9.4 Formal

Where informal solutions fail, or serious harassment or bullying occurs, employees can bring a formal complaint in the form of a grievance, with the procedure adapted to take account of the sensitivities of such situations. Each step and action under the formal complaint's procedure will be taken without unreasonable delay.

Complaints will be investigated swiftly and confidentially while ensuring that the rights of both the alleged victim and the alleged harasser or bully are protected. Employees and witnesses can be assured that they will not be ridiculed or victimised for making, or assisting a colleague in making, a complaint, even if it is not upheld, as long as it is made in good faith. Everyone involved in the investigation, including witnesses, will be required to maintain confidentiality – a failure to do so will be a disciplinary matter. The procedure is as follows:

9.5 Step 1: Lodging a statement of grievance and conducting an investigation:

- The complaint should be put in writing, outlining the alleged incidents, when they occurred, the harm caused, the names of any witnesses and the name of the alleged harasser or bully.
- If the victim would find it distressing to set out their complaint in writing then he or she should contact the HR department who will provide assistance.
- The written complaint should initially be lodged with the employee's manager. If this would not be appropriate in the circumstances, it should be lodged with the relevant member of the HR department.
- An independent investigator will be appointed who has had no previous involvement with the situation and who will conduct investigatory interviews with the complainant, the individual against whom the complaint has been lodged and any relevant witnesses. The right to accompaniment will be provided to all those interviewed.
- The investigator will submit a full report to the senior manager who is to hear the grievance.

9.6 Step 2: Grievance meeting:

- The employee will be invited to a meeting with a senior manager to discuss the grievance and the result of the independent investigator's report.
- The employee will be provided with the right to accompaniment.
- The timing and location of the meeting must be reasonable.
- The meeting will not take place until the senior manager has had a reasonable opportunity to consider the information contained in the employee's grievance letter and the independent investigator's report.
- The employee must take all reasonable steps to attend the meeting.
- The meeting must be conducted in a manner that enables the employee to explain his or her case and the senior manager to set out the results of the investigation.
- After the meeting the senior manager will inform the employee of his or her decision as to the grievance and notify the employee of the right to appeal against that decision if the employee is not satisfied with it.

9.7 Step 3: Hearing the appeal:

- If the employee wishes to appeal, he or she must inform the manager who is to hear the appeal who must be senior to the manager who heard the grievance.

- The employee will be invited to attend a further meeting.
- The employee will be provided with the right to accompaniment.
- The timing and location of the meeting will be reasonable.
- The employee must take all reasonable steps to attend the meeting.
- The meeting will be conducted in a manner that enables both sides to explain their cases.
- After the appeal meeting the manager who heard the appeal will inform the employee of the final decision, within 5 working days.

Full records will be kept of the grievance proceedings and copies of meeting records given to the complainant.

If, at the end of Step 1, the complaint is upheld the matter will be passed to the appropriate line manager to conduct a disciplinary hearing with the person who perpetrated the harassment or bullying.

9.8 Appeals

If you are not satisfied with the outcome you may appeal in writing to a member of the senior leadership team not involved in the original investigation or decision, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you.

We will hold an appeal meeting, normally within one week of receiving your written appeal. This will be dealt with impartially by a manager who has not previously been involved in the case (although they may ask anyone previously involved to be present). You may bring a colleague to the meeting.

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.

9.9 Protection and support for those involved

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.

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

9.10 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.

Information about a complaint by or about an employee may be placed on the employee's HR 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.

9.11 Related policies

- Disciplinary Procedure
- Grievance Procedure
- Whistleblowing Policy
- Safeguarding Policy

10 CONTINUING TO WORK TOGETHER

Whether a complaint is upheld or not, we recognise that it may be difficult for the employees concerned to continue to work in close proximity to one another during the investigation or following the outcome of the proceedings. If this is the case we will consider a voluntary request from either party to transfer to another job or work location. A transfer cannot always be guaranteed, however.

11 MONITORING

- 11.1 Where harassment or bullying has been found to have occurred and the perpetrator remains in employment, regular checks will be made to ensure that harassment has stopped and that there has been no victimisation or retaliation against the victim. We will also ensure that the employee who committed the act of harassment or bullying is not victimised in any way.

12 MALICIOUS COMPLAINTS

- 12.1 Where a complaint is blatantly untrue and has been brought out of spite, or for some other unacceptable motive, the complainant will be subject to the disciplinary procedure, as will any witnesses who have deliberately misled us during its investigations.

13 COMPLAINTS TO AN EMPLOYMENT TRIBUNAL

- 13.1 While we trust that employees will use the internal procedure to resolve any concerns they have about harassment, claims can be lodged with an employment tribunal where harassment is on the grounds of:

- sex
- gender reassignment
- race
- disability
- sexual orientation
- religion
- belief
- age