

Bullying, harassment and victimisation policy

The Company will not tolerate any form of bullying, harassment or victimisation.

The purpose of this policy is to inform employees of the type of behaviour that is totally unacceptable and to explain what solutions there are to employees who may suffer the unlawful actions of bullying, harassment or victimisation. It also sets out the steps that the Company will take to deal with any employee complaints of bullying, harassment or victimisation including by third parties such as visitors to the premises, and victimisation.

We provide separate but similar policies for use by workers and agency staff, which confirm that the Company will not tolerate any form of bullying, harassment or victimisation.

The Company intends to provide a neutral working environment and a culture that is diverse, equitable and inclusive. No one should feel threatened or intimidated and all should be treated with dignity and respect. All employees are required to uphold, promote and apply this policy.

This policy also applies to work social events, such as a Christmas party, and to social media posts between colleagues, which will be still classed as a 'work situation'.

Bullying

Bullying can be described as offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power through means intended to undermine, injure or humiliate the recipient. Bullying may be physical, verbal or non-verbal conduct. Obvious examples are:

- Threats of or actual physical violence.
- Unpleasant or over repeated jokes about a person, including name-calling.
- Unfair or impractical performance requirements or targets.
- Constantly criticising someone's work.
- Making threats about job security.
- Excluding someone from team social events.
- Removing someone from a team social media group because they have raised a complaint of bullying.

Harassment

Harassment is a discriminatory act, and employees can be personally liable for harassment claims. The protected characteristics relevant to harassment are age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.

Harassment is very difficult to define as it can take many forms, but in the main it is unwanted behaviour related to a relevant protected characteristic towards others, which has the purpose or effect of violating the victim's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment ('a hostile environment') for them. It could also be that the victim doesn't have the relevant protected characteristic, but witnessing the harassing behaviour has still created a hostile environment for them.

The following are examples of harassing behaviour:

- Derogatory comments about someone's clothing that are related to a protected characteristic, for example in relation to religious clothing.
- 'Jokes' or 'banter' against a protected characteristic, for example racist 'jokes'.
- Consistently using the wrong names and pronouns following a gender identity transition.
- Mimicking or making fun of someone's disability.
- Marginalising someone because they are of a particular race.

Sexual harassment

Sexual harassment is any unwanted sexual conduct that has the purpose or effect of violating a person's dignity or creating a hostile environment for them.

The law requires employers to take reasonable steps to prevent sexual harassment of workers in the course of their employment.

Examples of sexual harassment include:

- Unwelcome sexual invitations or pressure to meet up socially on a date.
- Displaying sexually explicit material.
- Unwanted physical sexual behaviour, for example caressing or grabbing in a sexual manner.
- Leering or making sexually suggestive gestures.
- Sending pornographic material.

Harassment also includes unwanted sexual conduct, or that is related to sex or gender reassignment, which creates a hostile environment and because of a rejection of, or submission to, the conduct, the harasser treats the person less favourably. For example:

- Threatening that an employee will lose their job because they have refused to enter into a sexual relationship with the manager.
- Spreading malicious rumours about someone's transgender status and then refusing to promote them because they raised a grievance about this.

Third party harassment

Third-party harassment occurs where a person is harassed by someone who does not work for the same employer, such as a visitor or supplier. We recognise the seriousness of third-party harassment and we have zero tolerance towards this. Employees are encouraged to report any incidents of harassment by third parties which they experience or witness.

Consequences of breaching this policy

Incidents of bullying, harassment or victimisation, including authorising or condoning such behaviour, will be treated as potential gross misconduct and may result in summary dismissal.

Training

All new starters must attend training on this policy as part of their onboarding programme.

Every current employee must attend regular training as an update on this policy.

Monitoring and review

We carry out regular reviews of this policy to monitor its effectiveness.