



Respect at Work

Anti-Bullying and Anti-Harassment Policy

Everyone within the organisation has a responsibility to treat each other the way they would like to be treated themselves – With Respect.

Respect helps to create a productive working environment, which fits strongly with the Company's culture. This policy supports the elimination of bullying, harassment and sexual harassment whilst promoting a fair and inclusive working environment.

Scope

This policy applies to anyone working for us. This includes colleagues, contingent workers, consultants, customers, suppliers, volunteers, interns and apprentices. The policy also relates to job applicants, and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

We will not tolerate any bullying: either at work (including at our premises or at remote workplaces), or at work-related events whether on or away from our premises (such as business trips or social functions). Any such conduct will be treated as a disciplinary offence.

We will not tolerate any harassment: either at work (including at our premises or at remote workplaces), or at work-related events whether on or away from our premises (such as business trips or social functions). Any such conduct will be treated as gross misconduct.

In addition, we will not tolerate any retaliation against, or victimisation of, any person who has been involved in bringing a complaint of harassment or bullying. Any such conduct will be treated as a disciplinary offence.

Policy Statement

We have a zero-tolerance approach to bullying and harassment and are committed to ensuring that all members of staff are treated, and treat others, with dignity and respect. We understand that experiencing inappropriate behaviour can impact the mental and physical health of those affected, both in their personal and working life, as well as having a negative impact on our workplace culture and productivity. We will treat all allegations seriously and will deal with them in accordance with this policy.



We expect you, and every one of our colleagues, contingent workers, consultants, customers, suppliers, volunteers, interns and apprentices take personal responsibility for observing, upholding, promoting and applying this policy.

Whatever your role is, we expect your personal commitment to uphold this policy.

The organisation's commitment to this policy means that individuals should be informed of this policy and its principles, and we ensure that they apply these principles during all engagements with the company.

Individuals and the organisation can be held liable for acts of bullying, harassment, victimisation and discrimination, which includes acts against fellow employees, contingent workers, consultants, customers, suppliers, volunteers, interns, apprentices and the public.

Individuals should conduct themselves in a way which provides equal opportunities to all, and prevents bullying, harassment, victimisation and discrimination.

Readers of this policy should be aware that harassment is unlawful. Workers are protected by the Equality Act 2010.

If you are unsure as to which acts protect workers, please see Appendix A and you can also seek advice from your manager.

What type of treatment amounts to 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 that person.

Harassment is unlawful under the Equality Act 2010.

Harassment also includes situations where someone is treated less favorably because they have submitted to or refused to submit to such harassing behaviour in the past.

Harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to another protected characteristic such as 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. The organisation's stance is that harassment is unacceptable even if it does not fall within any of these categories.



Examples of harassment

Harassment can occur in many forms, and can take place either at work or outside work. While this is not an exhaustive list, examples include:

- “banter”, jokes, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory against any other protected characteristic;
- unwanted physical behaviour, for example, pushing or grabbing;
- excluding someone from a conversation or a social event or marginalising them from the group;
- derogatory comments about pregnancy, maternity leave or IVF treatment;
- mimicking or making fun of someone’s disability;
- derogatory or offensive comments about religion;
- unwelcome comments about someone’s appearance or the way they dress that is related to a protected characteristic;
- “outing” (i.e. revealing their sexual orientation against their wishes), or threatening to “out”, someone;
- consistently using the wrong names and pronouns following the transition of a person’s gender identity;
- displaying images that are racially offensive; and
- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

Meaning of sexual harassment

Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

All Harassment is unlawful under the Equality Act 2010.

Examples of sexual harassment

Sexual harassment can occur in many forms. While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;



- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (e.g. by text, video clip, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

What type of treatment amounts to bullying?

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment).

Examples of bullying

While this is not an exhaustive list, bullying may include:

- physical, verbal or psychological threats;
- excessive levels of supervision; and
- inappropriate and derogatory remarks about a person's performance.

It is important to understand that legitimate, reasonable and constructive criticism of a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to bullying.

Microaggressions

Microaggressions – sometimes called micro-incivilities – are statements, actions, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority. They are sometimes referred to as "death by a thousand cuts". Microaggressions generally take one of three forms:



- Micro-assaults: Conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example directing limp-wristed hand gestures towards a gay colleague and saying "It's just a joke".
- Micro-insults: Unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability "You don't look disabled to me".
- Micro-invalidations: Where a person denies, or seeks to cancel, the feelings and lived experiences of a marginalised individual or group, for example a white person saying "I don't think the UK has a problem with racism – some people are just too sensitive".

Serious microaggressions can amount to unlawful harassment, bullying or discrimination but even less serious microaggressions can negatively impact the health and wellbeing of the person experiencing them.

What to do if you are being bullied or harassed?

Informal route

Bully/harasser is a colleague

If you feel able to, you may decide to raise the issue with the individual themselves, to make clear that their behaviour is not welcome and to ask them to stop. They may not be aware that their behaviour is offending you.

Alternatively, if you do not feel able to speak directly to the individual, you may consider asking your manager, a colleague, or HR for support.

You may or may not want them to talk to the individual on your behalf and, where possible, we will respect your wishes. However, if the welfare or safety of you or others is at risk or where your allegations are particularly serious, we may have to approach the individual and commence a formal investigation. In such a case we will, where possible, discuss this with you first.

We want colleagues to come forward and report concerns as soon as possible. If you feel unsafe we encourage individuals to speak with their manager, a colleague or HR as soon as possible.

If you would prefer not to discuss the issue with anyone at work, help and support is also available through our employee assistance programme (EAP). You can use our EAP to speak to an independent adviser on a confidential basis about any issue that is troubling you. You can find information and contact details on Beam.

Bully/harasser is a third party



If you are experiencing bullying or harassment by a third party, for example a client or a supplier, we encourage you to report this to your manager or the HR team without delay so that they can advise and support you on the best course of action.

Formal route

If you are not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise it formally.

To make a formal complaint, you should discuss this first with your line manager. If your complaint is about your line manager, or if you don't feel comfortable to raise the complaint with your line manager, you should raise this with the next level of management or your HR Business Partner in person or via email.

While you can raise a formal complaint of bullying or harassment under our Grievance procedure, you may prefer to do so under this policy because it is specifically aimed at dealing with such issues. You should be aware that you cannot raise a complaint under this policy if you have raised a complaint about the same issue already under the Grievance procedure.

Under the formal procedure within this policy, we will usually:

- ask you to set out your complaint in writing and include as much detail as possible, for example the alleged bully/harasser's name, the nature of the bullying/harassment, the dates of the alleged acts of bullying/harassment, names of any witnesses, and details of any action taken to address the matter so far;
- hold a meeting with the alleged bully/harasser to ascertain their response to the allegations;
- carry out further investigations where necessary, including interviewing potential witnesses who we will instruct to keep the matter confidential;
- invite you to a meeting to discuss your complaint in full and where you will have the right to be accompanied by a colleague or trade union representative;
- hold a meeting with you to enable us to ask you further questions in light of any information we have gathered from the alleged bully/harasser and/or witnesses;
- consider all the evidence in full and make a decision; and
- inform you of our decision and, if we uphold the complaint, instigate disciplinary action up to and including dismissal against the bully/harasser.

We will investigate fully every formal complaint in an objective and confidential way, while also ensuring that we respect your rights as well as the rights of the alleged bully/harasser.



We will use every effort to complete an investigation into bullying or harassment as quickly as possible.

Where the alleged bully/harasser is a third party, we may need to adjust the procedure under this policy to ensure we conduct appropriate investigations and we will discuss this with you.

We retain the discretion to choose whether to hold meetings in person or remotely, as appropriate, depending on the circumstances.

If a meeting is to be held remotely:

- we will ensure that all participants (including, if applicable, any permitted person that you choose as a companion) can access the necessary technology and materials;
- we ask you to inform us if you have a disability or other accessibility issue that could affect your ability to use video conferencing technology so that we can consider any reasonable adjustments; and
- you must not have anyone else in the room with you during the meeting (other than your permitted chosen companion, if applicable, if they are attending from the same physical location as you)

Appeals

If you are not satisfied with the outcome of the formal investigation, you have the right to appeal.

Should you wish to appeal, you should follow the steps as outlined in your outcome letter. Appeals should be submitted without unreasonable delay and usually no longer than five working days after we inform you of the decision.

The appeal manager will arrange a meeting with you to discuss your appeal in full and to try and reach a satisfactory solution. You must take all reasonable steps to attend this meeting and you may be accompanied by a colleague or trade union representative.

The appeal manager will write to you to confirm the outcome of the appeal, which will be final.

Support for those affected or involved

We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do our utmost to support you.



If you feel you cannot continue to work in close contact with the alleged bully/harasser, we will consider seriously any requested changes to your working arrangements during our investigation into the matter.

For support, you can access free, confidential counselling from our employee assistance programme. Please navigate to the People Hub on Beam and select the link for EAP.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If you feel you have suffered such victimisation, please inform your line manager or your HR Business Partner as soon as possible.

Consequences of breaching this policy

If, following a formal investigation, we find that you have committed, authorised or condoned an act of bullying or harassment, we will deal with the issue as a possible case of misconduct or gross misconduct.

We may take disciplinary action against you, up to and including dismissal (or other appropriate action for non-employees). Please refer to our Disciplinary procedure for further information.

Sensitivity and confidentiality

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

If you are found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take disciplinary action against you up to and including dismissal (or other appropriate action for third parties).

Record-keeping and Audits

We process personal data collected in relation to bullying or harassment complaints in accordance with our data protection policy. In particular, data collected in relation to the investigation of bullying or harassment complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints and conducting an investigation. You should immediately report any inappropriate access or disclosure of employee data in accordance with our Data protection policy as this constitutes a data protection breach. It may also constitute a disciplinary offence, which we will deal with under our disciplinary procedure. We analyse data around allegations of bullying or harassment (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this



policy and related training.

Responsibility for this policy

This policy is owned by the HR department. This policy will be reviewed if there is a legislative change or a business need to do so. This policy was last reviewed and agreed by HR in: September 2024.

This policy does not form part of your contract of employment and we reserve the right to amend or withdraw it at any time.



Appendix A

Anti-harassment laws: The Equality Act 2010 prohibits harassment against workers and job applicants because of a protected characteristic. Under the Act, the protected characteristics are: age, disability, gender reassignment (i.e. transgender status), marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Third-party harassment: There are no provisions in the Equality Act 2010 to cover third-party harassment. However, employees who have been subjected to harassment by a third party may still be able to bring a claim against their employer, for example for constructive dismissal, if the employee resigns and claims that the employer's failure to protect them amounts to a breach of contract. An employer could also be liable for negligence if the employee suffered mental and/or physical injury because of harassment by a third party.

Bullying: Unlike harassment, there is no legislation in the UK that explicitly prevents bullying at work. However, there are a number of laws and legal principles that may protect those who are being treated unfairly, such as:

- The Employment Rights Act 1996 which, among other things, protects employees from experiencing detriment under certain circumstances.
- The Protection from Harassment Act 1997, which is designed to protect people from any form of persistent conduct that causes them distress.
- The Health and Safety at Work etc. Act 1974, which requires employers to protect its staff from any risks to their health and safety.
- The Human Rights Act 1998, which protects people from experiencing behaviour that infringes on their human rights.
- The duty of care that employers have for their employees under common law, which requires employers to protect their employees from suffering any unreasonable harm or loss while at work.