# Harassment and Bullying

## What this policy covers

This policy applies to employees, workers and contractors and covers bullying & harassment of anyone in the workplace. The workplace includes normal business premises, client sites or any work-related setting (including locations for training and work-related social events). This policy also applies to virtual settings and social media where deemed to be work-related.

As part of the Company's overall commitment to equality of opportunity, it is fully committed to promoting a fair and harmonious working environment in which everyone is treated with respect and dignity and in which no individual feels bullied, threatened or intimidated. The aim of this policy is to prevent harassment and bullying in the workplace which includes harassment and bullying by other workers or by third parties you encounter while doing your job.

The Company has a zero-tolerance policy toward any form of harassment or bullying in the workplace. Such behaviour is unacceptable and will not be permitted or condoned, and will be viewed as a gross misconduct offence which may result in dismissal without notice.

## What is harassment and bullying?

Harassment and bullying detract from a productive working environment and can impact on the health, confidence, morale and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behaviour.

### Definition of harassment

Harassment is any unwanted physical, verbal or non-verbal conduct based on sex, sexual orientation, marital or civil partnership status, gender reassignment, religion or belief, age, race or disability which affects the dignity of anyone at work or creates an intimidating, hostile, degrading, humiliating or offensive environment.

A single incident of unwanted or offensive behaviour can amount to harassment. Some examples are given below, but many forms of behaviour can constitute harassment. These examples are:

- physical conduct, ranging from touching, pushing or grabbing to punching or serious assault
- verbal or written harassment through jokes, offensive language, defamatory remarks, gossip, threats or letters
- unwelcome sexual behaviour, including unwanted suggestions, propositions or advances
- the sending or displaying of material that is pornographic or obscene, including e-mails, text messages, video clips, photographs, posters, emblems or any other offensive material
- inappropriate posts or comments on or via social media commonly known as "cyber bullying"

- isolation, non-co-operation at work or exclusion from social activities
- coercion, including pressure for sexual favours
- inappropriate personal contact, including intrusion by pestering or spying

It should be noted that it is the impact of the behaviour that is relevant and not solely the motive or intent behind it.

Third-party harassment

Third-party harassment occurs where a worker is harassed by someone that does not work for the Company but has come into contact with them during the course of employment. This may include but not be limited to customers, suppliers, clients, service users, residents, guests, patrons, passengers, agents, patients and contractors.

The Company takes all reasonable steps to proactively prevent third-party harassment of its staff.

Definition of bullying

Bullying is persistent, offensive, abusive, intimidating or insulting behaviour, which, through the abuse of power, makes the recipient feel upset, threatened, humiliated or vulnerable.

Bullying can be a form of harassment and can undermine an individual's self-confidence and self-esteem and cause them to suffer stress.

Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- shouting at or humiliating others
- high-handed or oppressive levels of supervision
- unjustified, offensive and/or insulting remarks about performance
- exclusion from meetings, events or communications without good cause
- physical or emotional threats

Bullying can occur in the workplace and outside of the workplace at events connected to the workplace, such as social functions or business trips.

Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a worker's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that worker.

The Company has a positive legal duty to prevent the sexual harassment of its workers.

Sexual harassment can take many forms and may occur in the workplace, outside of work, in person, over the phone or online.

Examples of sexual harassment include:

- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions
- suggestions of sexual activity

- unwanted physical contact or touching
- showing or sending offensive or sexual material by any method (e.g. by text, email or social media etc.)
- unwelcome sexual advances, suggestive behaviour or propositions
- offensive comments about appearance or dress, innuendo or lewd comments
- making sexually suggestive gestures
- spreading gossip and speculation about a person's sexual orientation or status, including spreading rumours.

The Company takes all reasonable steps to proactively prevent sexual harassment of its staff in the workplace, including:

- providing appropriate training for workers and ensuring that this training is regularly refreshed
- undertaking appropriate workplace risk assessments to consider risks and control measures relating to sexual harassment
- ensuring that line managers understand their role in preventing and stopping bullying and harassment from occurring in the workplace
- encouraging and welcoming concerns and complaints being raised where individuals consider they have experienced or witnessed incidents of sexual harassment
- ensuring that concerns or complaints of sexual harassment are treated with sensitivity and care and addressed in a proper and thorough manner.

## Your rights and responsibilities

### Your rights

You have the right to work in an environment which is free from any form of harassment or bullying. The Company recognises your right to complain about harassment or bullying should it occur. All complaints will be dealt with seriously, promptly and confidentially.

Every effort will be made to ensure that, when you make a complaint, you will be protected from further acts of bullying and harassment. If others also give evidence or information in connection with the complaint, they equally will be protected. Perpetrators of these acts will be subject to disciplinary action which may warrant dismissal.

### Your responsibilities

You have a responsibility to help ensure a working environment in which the dignity of everyone is respected. You must comply with this policy and you should ensure that your behaviour to colleagues and anyone connected to the Company, does not cause offence and could not in any way be considered to be harassment or bullying.

You should discourage harassment and bullying by making it clear that you find such behaviour unacceptable. You should also support colleagues who suffer such treatment and are considering making a complaint. You must alert a manager or supervisor immediately to any incident of harassment or bullying to enable the Company to deal with the matter promptly and effectively.

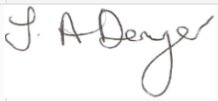
The Company's responsibilities

The Company will ensure that adequate resources are made available to promote respect and dignity in the workplace and to deal effectively with complaints of harassment and bullying. This policy and procedure will be communicated effectively to all and the Company will ensure that everyone is aware of their responsibilities. Appropriate training, where necessary, will be provided.

## Procedure

In order to raise a complaint of harassment or bullying, please refer to the Company Grievance Procedure (outlined elsewhere in this Employee Handbook

**Approval:** This policy has been reviewed and approved by the following individuals:

| Name | Title | Signature | Date |
|---|---|---|---|
| Jackie Denyer | Managing Director |  | 3rd November 2026 |