Harassment Policy

Policy Statement

The Company is committed to providing a working environment that is free from harassment and bullying. Any form of harassment or bullying will not be tolerated. All employees have the right to work in a safe, respectful, and inclusive environment where they feel secure and supported.

Objectives

This policy aims to:

- Inform employees about unacceptable behaviours that constitute harassment or bullying.
- Provide a clear procedure for dealing with complaints of harassment or bullying.
- Ensure that all employees feel safe to raise concerns without fear of victimisation.
- Promote a workplace culture of dignity, respect, and fairness for all.

Scope

This policy applies to all employees, contractors, temporary workers, and anyone else engaged to work at the Company, regardless of role or seniority. It covers all work-related activities, both on and off Company premises, including work events and online communications related to work.

What is Harassment?

Harassment is unwanted conduct affecting the dignity of individuals in the workplace. It can be related to age, sex, race, disability, religion, sexual orientation, nationality, or any other personal characteristic. It is also a criminal offence.

Examples include:

- Patronising or belittling comments
- Comments about appearance, body, or clothing
- Leering or staring at someone's body
- Unwelcome sexual invitations or pressure
- Promises or threats in exchange for sexual favours
- Displaying offensive or explicit material
- Unwanted touching, hugging, or indecent assault

The key test is whether the behaviour is <u>unwelcome</u>, <u>uninvited</u>, <u>and unreciprocate</u>d.

What is Bullying?

Bullying is offensive, intimidating, malicious, or insulting behaviour. It often involves a misuse of power intended to undermine or humiliate the recipient. Examples include:

- Threats of or actual physical violence
- Repeated unpleasant jokes about a person
- Unfair or excessive workloads

Bullying may be physical, verbal, or non-verbal and can occur in person or online.

Informal Resolution

If you experience harassment or bullying, and feel able to do so, you may try to resolve the issue informally. You can speak to the person involved to explain that their behaviour is unwelcome and must stop.

If this is too difficult, support from a Director can be sought to intervene informally.

Formal Complaints Procedure

If the issue is serious or unresolved, you must bring it to the attention of a Director. Where possible, keep a detailed record of each incident, including the date, time, location, and nature of the behaviour.

Formal complaints will be handled under the Company's grievance procedure. Steps will be taken to separate you from the alleged harasser or bully during the investigation.

Protection Against Victimisation

You will not be victimised for raising a complaint in good faith. However, if the Company finds that a complaint was made with malicious intent following a full investigation, disciplinary action may be taken in accordance with the disciplinary procedure.

Appeals

You have the right to appeal any decisions made under this policy. The Company's appeal procedures also apply to decisions made under the equality, diversity, and inclusion policy.

Monitoring and Review

This policy will be reviewed annually or sooner in response to legal or operational changes.

Document Control and Accountability

- Effective from: 01/06/2025
- Approved by: Lisa Ridley
- Contact for queries:

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