

## PRESERVING STAFF DIGNITY AT WORK

### Policy statement

We are committed to providing a work environment in which all of our employees are treated with respect and dignity and that is free of any form of bullying or harassment based upon age, disability, gender reassignment, race (including colour, nationality and ethnic or national origins), religion or belief, sex, sexual orientation or upon any other ground.

We will not tolerate any form of bullying or harassment of our staff, or abusive, violent or aggressive behaviour towards them, by anyone, including by our clients, customers, contractors and suppliers. Therefore, we will take appropriate and necessary action against any third parties who we discover have committed an act of bullying or improper or unlawful harassment against, or who have been abusive, violent or aggressive towards, one or more of our employees.

### Definitions

We regard abusive, violent or aggressive behaviour as any behaviour which produces damaging or hurtful effects, whether physically or emotionally, on our employee.

Bullying is offensive, insulting, malicious or intimidating behaviour or an abuse or misuse of power which undermines or humiliates our employee.

Harassment occurs where you engage in unwanted conduct that:

- has the purpose or effect of violating our employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, or
- is reasonably considered by our employee to have the effect of violating their dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if you did not intend that effect.

The employee does not need to be the subject of the unwanted conduct for harassment to have occurred. For example, your conduct could be directed at someone other than the employee, or even at nobody in particular.

Conduct may be harassment whether or not you intended to offend. Something intended as a "joke" or as "banter" may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them. Behaviour which a reasonable person would realise would be likely to offend will always constitute harassment without the need for the employee having to make it clear to you that such behaviour is unacceptable. With other forms of behaviour, it may not always be clear to you in advance that it will offend a particular employee, for example, certain banter and jokes or inviting an employee for a private drink. In these cases, your behaviour will constitute harassment if your conduct continues after our employee has made it clear, by their words or conduct, that such behaviour is unacceptable to them. A single incident can amount to harassment if it is sufficiently serious.

### Examples

Examples of abusive, violent or aggressive behaviour include, but are not limited to, the following:

- verbal abuse, shouting or swearing
- physical assault, whether or not resulting in harm or injury
- assault using a weapon
- threat of harm to the employee, their property or their family.

Bullying and harassment may be verbal, non-verbal, written or physical and it includes conduct which takes place by telephone, e-mail and over the Internet. Examples of unacceptable behaviour include, but are not limited to, the following:

- unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature

- subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures
- the offer of rewards for going along with sexual advances or threats for rejecting sexual advances
- jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory
- demeaning comments about an employee's appearance
- questions about an employee's sex life
- the use of demeaning nicknames
- picking on or ridiculing an employee
- isolating an employee or excluding them from relevant work-related matters.

### **Dealing with complaints**

We encourage our employees to report all instances of bullying or harassment, or of abusive, violent or aggressive behaviour, and we will then deal with such allegations confidentially and speedily. This will include conducting an investigation into the allegations and, at that stage, we may ask the alleged perpetrator to provide a written statement setting out their version of events.

We are committed to taking appropriate action with respect to all complaints of bullying and harassment, or of abusive, violent or aggressive behaviour, which we uphold against third parties. For example, we may ask them to undertake to behave reasonably in future, or we may look to refuse to deal further with them (either permanently or for a temporary period), or we may permanently terminate any contractual arrangements.