

Our bullying and harassment policy

We are committed to providing a working environment that is free from bullying and harassment and in which people are treated with dignity, respect, courtesy and fairness. Behaviour amounting to bullying or harassment is dealt with by disciplinary procedure.

We do not tolerate harassment, bullying or victimisation for any reason. This includes race, ethnic or national origin, religion, religious belief, gender, gender reassignment, sexual orientation, marital status, pregnancy, disability, age, employment status, political opinion, trade union membership and any other legally protected status or form of harassment on any grounds.

Definitions

- Harassment: unwanted conduct with the purpose or effect of either violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person
- Sexual harassment: unwanted conduct of a sexual nature or unwanted conduct on the ground of a person's sex
- Bullying: offensive, intimidating, malicious or insulting behaviour or an abuse or misuse of power which has the effect of undermining, humiliating or injuring the recipient
- Victimisation: when an individual is subjected to unwanted and humiliating behaviour because he or she has made allegations of harassment or bullying or has acted as a witness in an investigation or complaint.

Examples of unacceptable behaviour

- Physical contact: unnecessary touching or brushing against another person's body, aggressive behaviour, assault or coercion
- Verbal harassment: ridiculing and demeaning behaviour, crude language, offensive jokes, offensive or suggestive remarks, innuendoes, lewd comments, spreading rumours, pestering, sexual advances, offensive propositions or pressure for sexual activity
- Non-verbal harassment: obscene gestures, any display or circulation of offensive or inflammatory material, offensive graffiti or personal comments, written communications such as offensive letters or e-mails, following, stalking or spying
- Punishment imposed without reasonable justification
- Unreasonable allocation of work or changes in duties or responsibilities without reasonable justification or consultation

- Threats or intimidation
- Deliberate exclusion of an individual for the purpose of causing harm
- Excessive and unjustified methods of supervision which are not universally applied
- Victimisation of a colleague who has made a complaint of bullying or harassment.

When determining whether conduct can be viewed as bullying or harassment, we consider all of the circumstances of the case, including the perceptions of the recipient of the unwanted conduct.

Computer systems must be used in accordance with our computer, e-mail and internet acceptable use policies.

Treatment of bullying, harassment and victimisation

All forms of bullying, harassment and victimisation are prohibited. In most cases such conduct will amount to gross misconduct, resulting in disciplinary action up to and including dismissal.

Furthermore, intentional bullying, harassment or victimisation is a criminal offence and conviction can lead to imprisonment or a fine.

Raising a complaint

Anyone who is experiencing or has experienced any form of harassment should raise their concerns as quickly as possible to allow prompt resolution, either by informal action or through the grievance procedure (see below).

If an employee raises a complaint but subsequently decides not to proceed, we may be obliged to pursue the matter. This will apply in cases where the complaint is of a serious nature or could put other employees at risk.

Where an act of bullying, harassment or victimisation is reported by someone other than the actual victim, we have a duty to investigate the incident and take appropriate action.

False or malicious complaints are regarded as a serious disciplinary offence.

Informal action

In some cases the situation may be resolved informally by discussing the matter directly with the harasser and making it clear that their behaviour is unwanted, unacceptable and must not continue. A colleague could also perform this function. This action may be particularly relevant where the harasser is unaware that their behaviour is unacceptable.

Alternatively, the issue may be raised with line management (or higher management in cases where the line manager is involved) or the HR department to discuss how the complaint may be resolved. Depending on the nature of the complaint, this course of action may lead to further investigation and formal action.

Formal action

A formal complaint can be made by invoking the grievance procedure. This option is available where informal action is inappropriate or has been unsuccessful and the alleged bullying/harassment is deemed to be of a serious nature or could put other employees at risk.

Each business area has its own grievance procedure. As a minimum, the procedure will comprise the following steps:

1. Complaints should be made in writing, including the name of the alleged harasser, the nature of the harassment, dates and times of the harassment and the names of any witnesses
2. An investigation will be conducted within a set timescale to ascertain the facts of the case and allow the complainant and the alleged harasser to state their case
3. The investigation will be carried out by individuals who are independent of the complaint and have appropriate authority
4. Employees will be entitled to be accompanied at all meetings during the investigation
5. Steps will be taken to ensure that the complainant, alleged harasser and any witnesses are protected from victimisation arising from the investigation. This may include temporary transfer or suspension with pay
6. Where harassment has been proved, appropriate disciplinary action will be taken. This may include transfer, demotion, verbal or written warning. Serious cases of harassment will be treated as gross misconduct, which may result in summary dismissal. In some cases, corrective action such as training and development may be appropriate
7. The individuals involved will be entitled to appeal against a decision or penalty imposed.

Colleagues who wish to raise a concern about malpractice or report an issue affecting the interests of the Group should refer to our whistleblowing policy.

Our bullying and harassment policy continued

Confidentiality

All interviews and discussions will be treated in the strictest confidence and will not be disclosed to anyone other than the individuals conducting the investigation. Where it is necessary to share information with those who are part of the investigation, this will be clearly explained to the complainant.

Responsibilities

Employees:

- Have a responsibility to help ensure a working environment in which the dignity of employees is respected
- Should ensure that their behaviour towards colleagues and customers does not cause offence and could not in any way be considered to be bullying or harassment
- Should discourage bullying and harassment by making it clear that they find such behaviour unacceptable and by supporting colleagues who suffer such treatment and are considering making a complaint
- Should alert a manager or supervisor to any incident of harassment to enable the matter to be dealt with.

Managers and supervisors:

- Have a duty to implement this policy and make every effort to ensure that bullying or harassment does not occur, particularly in work areas for which they are responsible
- Have responsibility for any incidents of bullying or harassment of which they are aware or ought to be aware
- Must deal effectively with the situation if bullying or harassment does occur.

The Group:

- Will provide adequate resources to promote respect and dignity in the workplace and deal effectively with complaints of harassment
- Will communicate this policy and procedure effectively to all employees
- Will ensure that all employees and all managers and supervisor are aware of their responsibilities.

Employee assistance programme

We provide an employee assistance programme through BUPA. Employees can call a helpline for confidential advice and guidance on matters relating to bullying, harassment and stress. The help line number is 0800 371 536.

Further information

Business principles policy
Equal opportunities policy
Whistleblowing policy