People Policy:
Dignity at Work

This policy applies to all colleagues working for the Company or on its behalf in any capacity, including contractors, external consultants and third-party representatives.

The purpose of this policy is to ensure that everyone is treated and treats others with dignity and respect, free from harassment and bullying in the safety of our work environment. You should always consider whether your words or conduct could be offensive. Be mindful and considerate of others. Even unintentional harassment or bullying is unacceptable. It is important to take the time to ensure you understand what types of behaviour are unacceptable under this policy.

- This policy applies in the following contexts:
- Anywhere on the Company's premises;
- In any office or break-out space shared with other companies;
- Anywhere off the Company's premises, working from home, during work-related social events, business events or business trips;
- Online on Company email, intranet, internet systems and social media.

It covers bullying and harassment by colleagues and by third parties such as customers, suppliers or visitors to our premises.

We will take allegations of harassment or bullying seriously, as we operate a zero-tolerance approach, and will therefore address allegations or concerns promptly and confidentially. Harassment or bullying by a colleague is likely to be treated as gross misconduct, which may lead to summary dismissal.

WHAT THE LAW SAYS

Harassment is against the law, and under the Equality Act 2010 there are 3 types of harassment:

- harassment related to certain 'protected characteristics';
- sexual harassment;
- less favourable treatment as a result of harassment.

Harassment Related to a Protected Characteristic

This type of harassment is unwanted behaviour related to any of the following protected characteristics:

- age
- disability
- gender reassignment
- race
- religion or belief
- sex
- sexual orientation

To be harassment, the unwanted behaviour must have either violated the person's dignity or created an intimidating, hostile, degrading, humiliating or offensive environment for the person.

It can be harassment if the behaviour has one of these effects even it was not intended or if it intended to have one of these effects even if it did not have that effect.

Sexual Harassment

Sexual harassment is unwanted behaviour of a sexual nature.

Sexual harassment can happen to people of any gender identity or sexual orientation. It can be carried out by anyone of the same sex, a different sex or anyone of any gender identity. Sexual harassment can also be a one-off incident or an ongoing pattern of behaviour and can happen in many ways for example online through things like email, social media or messaging tools as well as physically. It does not need to be related to a protected characteristic for it to be considered harassment.

The Worker Prevention (Amendment of Equality Act 2010) Act introduced a legal duty on employers to take reasonable steps to prevent sexual harassment (the 'preventative duty').

Examples of preventative measures include, but are not limited to:

- making it clear that sexual harassment will not be tolerated;
- encouraging colleagues to report any incidents of sexual harassment;
- encouraging colleagues to report situations where they felt at risk, even if nothing happened;
- encouraging any colleague who witnesses sexual harassment to report this;
- setting standards of behaviour for work social events.

We recognise the need for regular risk assessments to identify and mitigate risks of sexual harassment. We will actively consider the risks of sexual harassment occurring in the course of employment and devise and implement reasonable steps to reduce those risks and proactively prevent sexual harassment occurring.

Less Favourable Treatment as a Result of Harassment

This type of harassment is when someone experiences less favourable treatment because of how they responded to previous harassment. It can apply whether the person rejected or 'submitted to' (accepted) the previous harassment. Harassment happens when the person is treated less favourably than they would have been if they had not responded to the previous harassment in the way they did.

Examples of Harassment

Harassment may include, for example:

- Unwanted physical conduct of any kind;
- Unwelcome sexual advances or suggestive behaviour, and suggestions that sexual favours may further a career or that a refusal may hinder it;
- Making sexual remarks about someone's body, clothing or appearance;
- Asking questions about someone's sex life;
- Sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
- Offensive or intimidating comments or gestures, or insensitive or offensive jokes or pranks;
- Mocking, mimicking or belittling someone;
- Deliberately excluding someone from a conversation or a workplace social activity.
- The misuse of power.

Please note that this is not an exhaustive list.

Harassment can be an isolated incident, or ongoing incidents of offensive behaviour.

Anyone who harasses someone at work is responsible for their own actions, however the Company will take all reasonable steps to prevent such acts wherever possible and will take any allegations seriously with a zero-tolerance approach to any harassment.

WHAT IS BULLYING?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. It does not need to be connected to a protected characteristic. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

As with harassment, physical, verbal and non-verbal conduct can all amount to bullying. It can take various forms, from extreme behaviour involving violence and intimidation, through to subtle actions such as deliberate exclusion. It can also take place online (cyberbullying).

Bullying may include, for example:

- Shouting at, being sarcastic towards, ridiculing or demeaning others;
- Physical or psychological threats;
- Overbearing and intimidating levels of supervision;
- Inappropriate and/or derogatory remarks about someone;
- Abuse of authority or power by those in positions of seniority; or
- Deliberately excluding someone from meetings or communications without good reason.

Constructive and fair feedback about someone's behaviour or performance from their manager or colleagues is not bullying. It is part of normal performance and developmental conversations and should not be interpreted as anything different.

IMPACT ON THE INDIVIDUAL

The impact on the individual is very important. A person's behaviour can amount to harassment or bullying even if they had no idea it would be perceived that way and even if it was not their intention to make the person feel that way.

It is still against the law even if the person being harassed or bullied does not ask for it to stop.

In addition, the unwanted behaviour doesn't have to be aimed at an individual for them to be offended by it. If it creates an intimidating or offensive environment for them or anyone else, then it could be harassment.

WHAT TO DO IF YOU WITNESS SUSPECTED HARASSMENT OR BULLYING

If you have witnessed what you believe to be harassment or bullying, you should not stay silent. If you can, speak to the person to whom the negative behaviour is directed towards and ask them what support they need. Encourage the colleague to raise the concern, and

remind them of the support available to them through their manager, the People and Culture team and other sources of support.

If appropriate and if you feel comfortable doing so, challenge the behaviour directly and ask the individual not to repeat it.

You should also make your manager aware of what you have witnessed, so they can ensure it is handled through the appropriate channels.

You can also report any suspected harassment or bullying to any member of the People and Culture Team.

WHAT TO DO IF YOU EXPERIENCE SUSPECTED HARASSMENT OR BULLYING

If you feel that you're being harassed or bullied, you should always speak to your manager initially to talk things through. If you don't feel comfortable speaking with your manager, you can speak with any member of the leadership team or the People and Culture Team. All complaints will be taken seriously and treated in the strictest of confidence.

Many issues can be resolved informally and it's sometimes a good idea to speak with the person you feel is harassing or bullying you, to explain that their behaviour is unwelcome, inappropriate, or upsetting. The person may not know that their behaviour is unwelcome or upsetting, so an informal discussion may help them to understand the effects of their behaviour and agree to change it.

However, it is recognised that sometimes it is difficult to speak with the perpetrator directly. If that's the case, it may be appropriate for your manager (or the appropriate person if the perpetrator is your manager) to speak to them confidentially to say that their behaviour is inappropriate and needs to change. Wherever possible your manager will aim to resolve things quickly and informally without the need to use a formal process. Dealing with things informally is often much less stressful and quicker for everyone involved.

FORMAL INVESTIGATIONS

Where the matter cannot be addressed informally, individuals should raise a formal complaint under the Grievance procedure, and the matter will be investigated thoroughly.

Decision to Investigate Formally

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all colleagues and may decide that the nature of the informal complaint is such that it needs to be considered formally, for example if the complaint is very serious and the informal approach would not be appropriate. That means that if anyone changes their mind after having raised a complaint of harassment or bullying (even where they complained informally or in confidence), it is likely that it will be investigated anyway to protect our colleagues. If this is the case, the individual's views will be considered before any investigation starts.

Investigation Process

We will investigate all complaints of this nature in a timely, confidential and sensitive manner in line with our Grievance policy. The investigation will be conducted by someone with appropriate seniority, training and experience and where possible with no prior involvement in the complaint.

The complaint will be treated in confidence, as far as is possible, and if it is found that anyone has been the victim of harassment or bullying, steps will be taken immediately to stop it continuing or recurring.

We will consider whether any steps are necessary to manage the ongoing employment relationship between all parties involved. If necessary, colleagues may be separated from the person they are complaining about whilst the investigation takes place. If that involves moving someone on a temporary basis, or even asking them to stay at home during the investigation, it is not a pre-judgment of the complaint; it is simply a method of trying to stop things getting worse during the investigation.

Outcome

If the complaint is not upheld, an explanation will be given. Either way, ways of addressing the relationships involved will be explored.

If it is found that harassment or bullying has occurred, then it is likely that this will be treated as gross misconduct under the Disciplinary procedure and may result in dismissal for the perpetrator.

PROTECTION FROM VICTIMISATION

If anyone makes a complaint about harassment or bullying, they will not be victimised as a result, i.e., they will not be treated less favourably because of it.

If you believe you have suffered any such treatment you should inform your manager or the People and Culture team. If the matter is not remedied, you should raise it formally using our Grievance procedure.

Anyone found to have retaliated against or victimised someone for making a complaint or assisting in good faith with an investigation under this procedure will be subject to disciplinary action under our Disciplinary procedure.

CONFIDENTIALITY

Harassment and bullying allegations can raise strong feelings and are always serious. This is why both the Company, the person making the allegation and anyone else involved in the process have an obligation to maintain confidentiality as far as possible. This applies at every stage, including the investigation and the outcome.

If anyone makes a harassment or bullying complaint and doesn't maintain proper confidentiality at any time during the process, or they are interviewed in connection with someone else's complaint and likewise fail to maintain confidentiality, they may face action under the Disciplinary procedure. This could lead to dismissal for misconduct or even gross misconduct.

BEHAVIOUR OF CUSTOMERS OR EXTERNAL PARTIES

Our duty to protect our colleagues extends to the behaviour of third parties. If anyone sees or experiences what they believe to be harassment or bullying of any of our colleagues by a customer or other third party, they should raise this immediately with their manager, any member of the leadership team or the People and Culture Team. Incidents of inappropriate behaviour directed towards our colleagues will not be tolerated under any circumstances.

In addition, incidents of any colleague behaving inappropriately towards any customer or other external party will also not be tolerated and should be reported in the same way.

PROVIDING SUPPORT

We understand that reporting harassment of any kind takes courage and can be extremely stressful. We will ensure that any individuals raising a concern or complaint are given reassurance and support throughout the process. This support will also be extended to any colleagues who have witnessed sexual harassment.

As well as providing opportunities to talk, our People and Culture team are trained to signpost colleagues to relevant or appropriate services. These include:

- Help@Hand through Unum, which offers a 24/7 helpline where colleagues can access support with trained professionals;
- Westfield Health, which offers structured counselling sessions;

Our internal team of Mental Health First Aiders can also provide guidance on where to seek further help, and they can ensure our colleagues understand how to seek this help. However, they wouldn't be involved in any formal reporting or investigation.

Further details on these sources of support can be found on the Wellbeing page on LeepPad.

In addition, we will deliver training sessions for all colleagues so that there is a companywide understanding of what harassment is and your role in preventing and addressing it. This will be completed during your onboarding journey, and thereafter through our annual essential learning cycle. Everyone should ensure they complete all essential learning in a timely fashion.

DOCUMENT HISTORY

Version	Issue Date	Author(s)	Details
1		Lucy Tannahill Natasha Lewis	Full review

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