

BULLYING & HARASSMENT POLICY

APPROVAL CONTROL

ROLE	NAME	DATE
People Director	Sara Robinson	18/02/2020

VERSION CONTROL

VERSION	AUTHOR NAME	VERSION CHANGES	DATE
0.1	Jayne Morris	Draft associate version	27/09/2016
0.2	Jayne Morris	Review with Sara Robinson	06/10/2016
1.0	Sara Robinson	Sign off	06/10/2016
1.01	Gail Lawrence	Annual review	01/10/2017
1.02	Jayne Morris	Annual review – no changes	01/10/2018
1.04	Scarlett Campbell	Annual review – no change made	16/04/2019
1.05	Scarlett Campbell	Annual review – no change made	01/10/2019
2.0	Sara Robinson	Amended to include social events	18.02.2020

TABLE OF CONTENTS

OBJECTIVE	3
APPLICABILITY	3
SCOPE	3
BULLYING	3
Examples of bullying.....	3
HARASSMENT	4
Harassment based on association	4
Harassment based on perception	4
Third Party harassment	4
Examples of harassment	4
SOCIAL EVENTS.....	5
PROCEDURE.....	5
RESPONSIBILITIES	6
TABLE OF DEFINITIONS.....	6
POLICY RESPONSIBILITIES.....	6
APPLICABLE STANDARDS AND LEGISLATION.....	7

OBJECTIVE

The objective of this policy is to communicate our position on bullying & harassment in the workplace.

APPLICABILITY

This policy applies to associates engaged by Huntswood on client projects, through an umbrella company or a limited company ("Associates").

SCOPE

Everyone has the right to be treated with dignity and respect and Huntswood is committed to providing a work environment that is aligned to its values and core behaviours where representatives can expect to be free from all forms of bullying and harassment.

If you feel bullied or harassed the matter will be taken seriously. When appropriate, every effort will be made to resolve the situation informally. Some incidents, however, by virtue of their serious nature, will need to be dealt with immediately and may in certain cases, ultimately lead to termination of contract.

BULLYING

We consider bullying to be any unsolicited or unwelcome act that humiliates, intimidates or undermines the individual involved. No form of bullying will be condoned at work.

Examples of bullying

Examples of bullying behaviour include (but are not limited to):

- derogatory comments - both verbal and written in all mediums;
- insensitive jokes or pranks;
- insulting or aggressive behaviour;
- ignoring or excluding an individual;
- setting unrealistic deadlines;
- public criticism;
- withholding necessary information;
- constantly undervaluing effort.

The actions listed above must be viewed in terms of the distress they cause the individual. The perceptions of the recipient are a key factor in determining whether any action or statement can be viewed as bullying.

HARASSMENT

Harassment can be physical, verbal or non-verbal, e.g. by letter or e-mail.

Harassment is unwanted conduct related to a protected characteristic which includes age, disability, sex (including pregnancy maternity and gender reassignment), race, sexual orientation, religion or belief, because someone is married, in a civil partnership or of part time status that

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating his/her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the conduct

OR

- behaviour that is found offensive even if it is not directed at the individual

Harassment based on association

Harassment based on association is unwanted conduct towards any individual for association with another individual who has a protected characteristic.

Harassment based on perception

Harassment based on perception is unwanted conduct towards any individual based on a perception that he or she has a particular protected characteristic when he or she does not, in fact have the protected characteristic.

Third Party harassment

Harassment may also include circumstances where an individual is subjected to unwanted conduct from a third party, such as a client or contractor. If you feel that you have been bullied or harassed by a third party, you should report any such behaviour to your team leader who will take appropriate action.

Examples of harassment

The following is a non-exhaustive list of examples of harassment;

- The display of sexually explicit material on computer screens or in calendars
- Physically touching someone in a sexual manner where such conduct is not welcome
- Remarks, banter or jokes about people from different racial backgrounds
- Deliberate isolation of someone on grounds of his or her sexual or perceived sexual orientation

- Showing or circulating written, printed or electronically disseminated material that may offend others
- Any attempt to penalise or punish a person for rejecting or objecting to unwanted actions

SOCIAL EVENTS

To foster team spirit and good working relationships, there are opportunities to attend social events from time to time. Huntswood may also run work-related social events to which clients, as well as Huntswood associates are invited.

Although such social events usually take place away from the workplace and outside of normal working hours, the organisation's standard code of conduct applies to such events. While Huntswood does not wish to put a dampener on the enjoyment of social events, it is in everyone's interests to impose certain rules of conduct for the protection and comfort of all. Specifically, those attending work-related social events must adhere to the following rules and principles:

- Associates should consume alcohol only in moderation at work-related social events, irrespective of whether the organisation provides or pays for the drinks.
- It is strictly forbidden for any Associates to use illegal drugs, including cannabis, at any work-related social event whether on organisation premises or not.
- The organisation's policy on harassment/bullying applies to work-related social events.
- Associates should not say or do anything at a work-related social event that could offend, intimidate, embarrass or upset any other person, whether as a joke or not.
- Associates must not behave in any way at any work-related social event that could bring the organisation's name into ill repute.
- Any breach of the above rules will render the Associates liable to disciplinary action under the organisation's disciplinary procedure / action for breach of contract, up to and including summary dismissal.
- The above rules are in place for the benefit of all Associates and to ensure that everyone can enjoy work-related social events in an atmosphere of conviviality without fear of being made to feel uncomfortable by another Associate's conduct.

PROCEDURE

If you receive a complaint of bullying or harassment, or are a witness to bullying or harassment, you should consult with the Senior Operations Manager or appropriate Manager in the first instance. You must respect the confidentiality of the matter.

It is often useful to make a written record of any incidents of bullying or harassment, including the date, time, and nature of incident, the names of those involved and the names of any witnesses.

The Senior Delivery Manager (SDM) will consider whether it is appropriate to attempt to resolve the issue informally. If so a meeting will be arranged at which the person who is bullying will be told by the individual who is being bullied that the behaviour is offensive and unwanted, and must stop. A

colleague may be present in support of the person who is being bullied when this statement is made. Alternatively, the SDM can speak to the alleged bully.

However, you do have the absolute right to complain formally and you should report the matter under the complaints process. The complaint will be properly investigated and treated confidentially. Care will be taken during an investigation to treat all those involved with consideration.

If it is established that an Associate has made a deliberately false or malicious complaint against another person about harassment or bullying, disciplinary action will be taken against that Associate.

RESPONSIBILITIES

We trust that all our Associates will act responsibly to maintain a working environment free of bullying and harassment.

Huntswood will:

- publicise this policy to its current staff;
- provide new Associates with a copy of this policy statement; and
- maintain effective procedures for the enforcement of this policy including the reporting of breaches.

TABLE OF DEFINITIONS

The table of definitions provides definitions of terms used within the policy document

TERM	DEFINITION
Huntswood Associate	Anyone engaged on a client project by Huntswood, through an umbrella company or a limited company.

POLICY RESPONSIBILITIES

The following table defines the business roles and their responsibilities in regard of the policy document.

RESPONSIBILITY	ROLE	DEFINITION
Owner	People Director	The Owner ensures the policy is reviewed and maintained on a regular basis
Reviewer	People Director	The Reviewer ensures the policy document aligns with relevant legislation and company requirements

RESPONSIBILITY	ROLE	DEFINITION
Author	Head of HR	Shall update the policy document in a succinct time frame on receiving updates from the reviewer and in accordance with company policy writing guidelines
Policy Audience	Associate engaged by Huntswood	Must apply the business policy to the business they undertake on behalf of Huntswood

APPLICABLE STANDARDS AND LEGISLATION

- Employment Rights Act 1996
- Equality Act 2010
- Protection from Harassment Act 1997