

## Anti- Harassment and Anti-Bullying Policy

Within Seddon, it is in everyone's interests for the environment in which we work to be harmonious and respectful. Although we would like to think that this is always the case, this policy recognises that inappropriate behaviour, which may include harassment, can and does take place. This policy aims to ensure that if inappropriate behaviour does occur in the workplace it is dealt with in a serious, sensitive and confidential manner so that the matter can be resolved as quickly as possible for all concerned.

We have a “zero tolerance” attitude to harassment and bullying. Suggesting that no offence was intended or claiming ignorance of the effect will not be considered as a defence against unacceptable behaviour. Employees should never fear coming to work because they may be subject to ridicule or humiliation.

We are committed to creating a harmonious working environment which is free from harassment, including discrimination, victimisation and bullying, and which protects the dignity of employees irrespective of sex, marital/civil partnership status, gender reassignment, disability, race, age, sexual orientation, or religion/belief or lack of any religion/belief ("protected characteristics"). Harassment is offensive and prejudicial to a productive working environment. It is indicative of a lack of respect for the person harassed, undermines his or her position and may have a negative impact upon health, job performance and sense of personal security.

We regard harassment on the grounds of a protected characteristic as a most serious matter. Such behaviour constitutes discrimination and is unlawful under the principles of the Equality Act 2010. Harassment may also be a civil offence and a criminal offence, and it may contravene health and safety legislation.

Everyone must comply with this policy and employees should ensure that their behaviour at all times does not cause offence or constitute harassment. Formal complaints will be investigated and in cases where the complaint is substantiated, appropriate disciplinary action, including dismissal, will be taken against the person or persons responsible. Harassers, their supervisors and their managers may all be held personally liable in the event of any legal proceedings. It is also important that employees read this policy in conjunction with our **PEO-POL-010 Equality, Diversity & Inclusivity Policy**.

### Scope

This policy applies to anyone working for us. This includes employees, workers, sub-contractors, volunteers and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

### Our Responsibilities

Seddon is committed to taking proactive measures to prevent all forms of bullying and harassment, including sexual harassment, of our workers.

We have undertaken risk assessments which will be regularly reviewed to determine reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace and by third parties that Seddon may have contact with.

### Your Responsibilities

We expect everyone to take personal responsibility for observing, upholding, promoting and applying this policy.

Any dealings you should have with third parties, including customers, suppliers, sub-contractors, agency staff and consultants, must be free from discrimination, harassment, victimisation or bullying.

We take bullying and harassment seriously, anybody who is found to have committed, authorised or condoned an act of bullying or harassment, the company will investigate this further and take action under our Disciplinary Procedure.

You should be aware that you can be personally liable for harassment.

If you experience bullying or harassment, we encourage you to speak up without delay and to ask for appropriate support.

## Who is Protected from Harassment

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation; and
- age.

Although pregnancy and maternity and marriage and civil partnership are not specifically protected under the legal provisions on harassment, we consider harassment on any ground to be unacceptable.

## Meaning of Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Harassment can occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not.

Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic.

## Meaning of Sexual Harassment

Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Employers are legally obliged to take reasonable steps to prevent sexual harassment of their workers in the course of their employment and by third parties.

## Meaning of Bullying

Seddon regards bullying as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

## Meaning of Microaggressions

Microaggressions are statements, actions, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority.

Serious microaggressions can amount to unlawful harassment, bullying or discrimination but even less serious microaggressions can negatively impact the health and wellbeing of the person experiencing them.

## What to do if you are being bullied or harassed

### Informal Route

*Bully/harasser is a colleague*

If you feel able to, you may decide to raise the issue with the individual themselves, to make clear that their behaviour is not welcome and to ask them to stop. They may not be aware that their behaviour is offending you.

Alternatively, if you do not feel up to speaking directly to the individual, you may consider asking your manager, a colleague, or the People Department for support.

You may or may not want them to talk to the individual on your behalf and, where possible, we will respect your wishes. However, if the welfare or safety of you or others is at risk or where your allegations are particularly serious, we may have to approach the individual and instigate a formal investigation.

*Bully/harasser is a third party*

Bullying and harassment by third parties, such as customers, clients, suppliers and/or sub-contractors, will not be tolerated.

If you are experiencing bullying or harassment by a third party, we encourage you to report this to your manager or the People Department without delay so that they can advise and support you on the best course of action.

### Formal Route

If you are not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise it formally.

To make a formal complaint, you should discuss this first with your line manager. If your complaint is about your line manager, you should raise this with the People Department.

You can raise a formal complaint of bullying or harassment under our Grievance Procedure.

We will investigate fully every formal complaint in an objective and confidential way, while also ensuring that we respect your rights as well as the rights of the alleged bully/harasser.

We will use every effort to complete an investigation into bullying or harassment as quickly as possible.

Where the alleged bully/harasser is a third party, we may need to adjust the procedure under this policy to ensure we conduct appropriate investigations, and we will discuss this with you.

## Appeals

If you are not satisfied with the outcome of the formal investigation, you have the right to appeal. Please refer to the Grievance Procedure.

## Whistleblowing Policy

Employees are encouraged to report any instances of harassment or inappropriate conduct through our established reporting channels, as outlined in our Whistleblowing Policy. Seddon is committed to maintaining confidentiality and protecting individuals in accordance with our whistleblowing standards. Please refer to our **PEO-POL-022 Whistleblowing Policy**.

## Support for those affected or involved

We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do what we can to support you.

If you feel you cannot continue to work in close contact with the alleged bully/harasser, we will consider seriously any requested changes to your working arrangements during our investigation into the matter.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If you feel you have suffered such victimisation, please inform the People Department as soon as possible.

Regardless of the outcome of your complaint, we will consider carefully how to best approach any ongoing working relationship between you and the individual concerned, including any third party. For example, depending on the specific circumstances, we may consider amending the job duties, location or reporting lines of either you or the other person. Alternatively, we may decide workplace mediation or counselling is appropriate.

## Legal & General (Health Assured) - EAP

The company operates a 24-hour helpline from an external provider, Health Assured, for when you need to seek advice on a problem. This is an external, confidential telephone service where you can call for advice, their number is: **0800 316 9337**

## Sensitivity and Confidentiality

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

If you are found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take further action under our Disciplinary Procedure.

## Consequences of Breaching this Policy

If, following a formal investigation, we find that you have committed, authorised or condoned an act of bullying or harassment, we will deal with the issue as a possible case of misconduct or gross misconduct.

If you are an employee, please refer to our Disciplinary Procedure for further information.

## Monitoring and Review

This policy is reviewed annually and, if necessary, amended to ensure that it remains effective. We analyse data around allegations of bullying or harassment (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our wider equality, diversity, and inclusion strategy.



Jonathan Seddon

Chief Executive Officer

Seddon Group Ltd