### Scope

This policy applies to all staff, whether permanent, temporary, casual, part-time or on fixedterm contracts. It also applies to ex-employees, job applicants and to individuals such as agency staff and consultants who are not our employees, but who work at the Foundation (collectively staff).

### Purpose

The purpose of this policy is to ensure that all employees and volunteers are treated with dignity and respect and are free from harassment, intimidation or other forms of bullying at work both on and offline. This anti-harassment and bullying policy should be read in conjunction with the Foundation's Equality, Diversity and Inclusion policy.

Harassment (including bullying) in any form of colleagues, volunteers, agency staff or contractors, customers, clients, peer on peer or any person with whom an individual comes into contact during the course of their duties, including on the grounds of sex, sexual orientation, gender reassignment, marital status, race, religion and belief, colour, nationality, ethnic or national origin, disability or age is unacceptable and will not be tolerated under any circumstances. All employees and volunteers are required to behave in a way that does not cause offence to others. Serious cases may also amount to discrimination or even a criminal offence, involving personal accountability for those responsible.

This policy is not designed to discourage normal social relations among colleagues or with the public. The aim is to prevent discrimination. However, this policy applies not only to interaction whilst working at the Foundations offices and those of any customer or contact but extends to time spent travelling away from home whilst on business, on training courses, conferences and social events with colleagues, both online and offline.

## **Responsibilities and Key Contacts**

The Foundation's Trustees have overall responsibility for this policy but have delegated dayto-day responsibility for overseeing and implementing action required under it to the Foundation's Chief Executive Officer.

Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change to the policy lies with the Foundation's Chief Executive Officer, or his nominated representative.

The Foundation's Marketing and Communications Manager is also responsible for monitoring social media and reporting any concerns to the Designated Safeguarding Officer.

All employees and volunteers, and in particular managers and supervisors must ensure that the Foundation's Policy on harassment and bullying is adhered to at all times. Managers also have a specific responsibility to facilitate its operation by ensuring that employees understand the standards of behaviour expected of them and by identifying and acting upon behaviour that falls below these standards.

All staff are responsible for treating their colleagues with dignity and should ensure that they take the time to read and understand it. You should disclose any instances of harassment or bullying of which you become aware to your manager or directly to the Chief Executive Officer.

Staff are assured that they will not be victimised for bringing a complaint. Any employee who is found to have victimised or retaliated against another for complaining, supporting another member of staff or giving evidence about harassment or bullying will be subject to disciplinary action.

## What Are Harassment and Bullying?

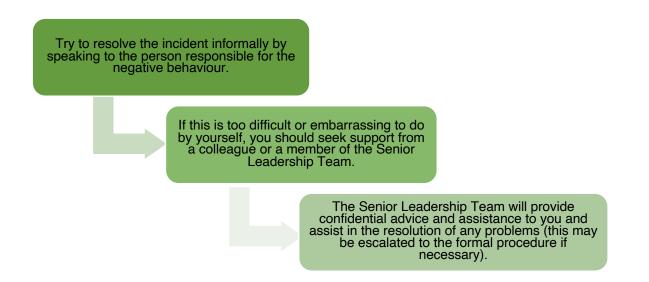
Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of affecting your dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment on and offline. Such conduct is commonly (but not always) related to sex, sexual orientation, gender reassignment, marital status, race, religion and belief, colour, nationality, ethnic or national origin, disability or age. Harassment generally arises where a person has made it clear that they find certain behaviour unwelcome, and that behaviour has continued unchanged although a single incident may amount to harassment if sufficiently serious.

It is important to remember that even though the conduct may only be unwanted or offensive to one individual it can still amount to harassment. If you believe you are being subjected to harassment you should not hesitate to use the procedures set out below. All individuals should consider whether their actions could be offensive to others.

Examples of harassment might include, but are not limited to: unwanted physical contact whether or not of a sexual nature; unwelcome sexual advances; propositions or pressure for sexual activity; continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome; offensive or intimidating comments; suggestions that sexual favours may further an employee's career or that refusal of sexual favours may hinder it, isolation or ostracism, unfair allocation of work or responsibilities, humiliating, demeaning, threatening or persistently criticising an individual; the display or circulation of pictures, objects or written materials that may be sexually suggestive, pornographic or offensive to particular ethnic or religious groups and insensitive jokes or pranks or transmitting any such messages or images via electronic mail.

Bullying means offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power intended to undermine, humiliate, denigrate or injure a colleague. Bullying does not include legitimate and constructive criticism of your performance or behaviour. Examples of bullying might include but are not limited to ridiculing or demeaning others, particularly junior colleagues, overbearing supervision and unjustifiably excluding colleagues from meetings/communications.

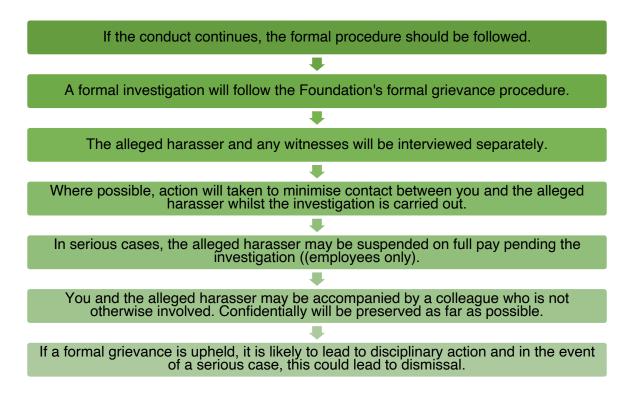
## **Informal Procedure**



If you are in any doubt as to whether an incident or series of incidents which have occurred constitute bullying or harassment, in the first instance you should approach the Head of Operations & Business Development confidentially on an informal basis. He will be able to advise you as to how the matter should be dealt with.

If the conduct continues or if it is not appropriate to resolve it informally, you should follow the formal procedure set out below.

## **Formal Procedure**



## Protection for those making complaints or assisting with an investigation

Staff and volunteers who, in good faith, make complaints under this policy will be protected from intimidation or victimisation in connection with any complaint. If you have been subjected to any such intimidation or victimisation you may raise a complaint in writing under this procedure or the grievance procedure. If after investigation you are found to have given information falsely and in bad faith you will, however, be subject to action under the Foundation's disciplinary rules and procedures.

### Confidentiality

Confidentiality is very important throughout all parts of this procedure. It is the responsibility of everyone involved in the procedure to respect the high level of confidentiality that is required. Breach of confidentiality may give rise to disciplinary action under the Foundation's disciplinary rules and procedures, which may result in your dismissal.

### **Policy Review**

Policy Issue Date April 2021 Date of Next Update April 2022

All safeguarding policies and procedures are due for a general review on the above date. They may however be reviewed and updated earlier, in the event of a change in Foundation requirements, or relevant legislation.