Bullying and Harassment Policy and Procedure

HR8.5 Employment Policies

December 2024

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1. Introduction
   1. MHA are committed to fostering a diverse, inclusive, and equitable workplace where everyone feels valued and supported. We recognise that each individual brings unique experiences and perspectives, and we are dedicated to creating a culture that embraces and celebrates difference. Key to this is seeking to eradicate bullying, harassment, victimisation, and discrimination at work.
   2. This policy and procedure support this aim by setting out MHA’s zero-acceptance approach to instances of bullying or harassment, providing clear definitions and examples of inappropriate conduct and actions and how we support those affected.
   3. This policy is underpinned by MHA's Values and [Behavioural Framework](https://onemhabehaviours.org.uk/).
2. Scope and Purpose
   1. The purpose of this policy and procedure is to support a working environment and an inclusive culture in which bullying, and harassment of any kind will not be accepted. Such behaviour may be regarded as a disciplinary offence. Where the allegations are founded, consideration will be given in the specific circumstances to the nature and the extent of the breach and a disciplinary sanction, up to dismissal, may be issued.
   2. This policy and procedure applies to all MHA colleagues with an MHA contract of employment and volunteers. For the purpose of this policy, the term “colleagues” refers to both volunteers and those employed by MHA and the term “working” refers to paid hours of work for those employed by MHA and volunteering hours for volunteers.
   3. Individuals engaged through an agency worker agreement are required to honour the requirements of this policy and any contravention will be referred to the agency supplier for resolution.
   4. The policy applies to all colleagues during working hours and outside working hours when attending formal workplace functions or events when the organisation retains an employer’s liability for the actions of its colleagues. It also applies to any social media communication, including social media activity for non-work purposes.
   5. This policy should be read in conjunction with MHA’s Resolution Policy and Procedure (employees) and Volunteer Problem Solving Policy and Procedure (volunteers).
   6. As part of our commitment to Equality, Diversity and Inclusion, MHA wish to make sure the way we work does not place people with disabilities at a disadvantage. We will therefore always make reasonable adjustments to our policies, practices, and procedures, where recommended by Occupational Health and / or Access to Work. For further information and support around reasonable adjustments, please see Recruiting, Managing and Developing People with a Disability or Health Condition Guidance or contact a member of the HR Team at [hr@mha.org.uk](mailto:hr@mha.org.uk).
3. Definitions

| Term | Definition |
| --- | --- |
| **Bullying** | Bullying is not specifically defined in law, but ACAS, define bullying as “offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient”. This includes persistent criticism and personal abuse and / or ridicule, either in public or private, humiliating or demeaning the individual(s) involved, gradually eroding their self-confidence. |
| **Protected Characteristic** | Protected characteristics are:   * Age * Disability * Gender Reassignment * Marriage And Civil Partnership * Pregnancy And Maternity * Race * Religion Or Belief * Sex * Sexual Orientation |
| **Harassment** | Harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that individual. |
| **Discrimination** | Discrimination means treating someone 'less favourably' than someone else, because of a protected characteristic. Less favourable treatment can be anything that puts someone with a protected characteristic at a disadvantage, compared to someone who does not have that characteristic.  This might include, but is not limited to:   * Excluding someone from promotion, training or other opportunities * Making it harder for someone to do their job e.g. by not providing appropriate training, equipment or reasonable adjustments * Causing someone emotional distress * Causing someone financial loss   It can still be discrimination even if the less favourable treatment was not intended. |
| **Victimisation** | When a person or group receives less favourable treatment than others or suffer a detriment because they have asserted their rights under anti-discrimination, anti-harassment legislation or MHA policies. |

1. Bullying
   1. There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent in nature, that has the effect of undermining, humiliating, or injuring the recipient. Bullying can be physical, psychological, 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.
   2. 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.
   3. While this is not an exhaustive list, bullying may include:
   * Physical, verbal, or psychological threats
   * Excessive levels of supervision or unjustifiable over-monitoring a colleague’s performance, e.g. unreasonable fault finding, nagging, watching over the person’s every move
   * Spreading rumours, malicious or offensive
   * Constantly putting someone down, undermining, criticising, showing a lack of respect and
   * Inappropriate and derogatory remarks about a person's performance
   * Undervaluing a colleague’s contribution, such as ignoring a colleague’s opinion
   * Public criticism of a colleague or employee
   * Persistently setting objectives with impossible deadlines or setting unachievable tasks; placing unreasonable demands on a colleague
   * ‘Cyber bullying’ where detrimental texts are sent via mobiles or images posted on external websites
   * Removing and replacing areas of responsibility with lower status, menial or trivial tasks
   * Withholding information with the intent of deliberately affecting a colleague’s performance
   * Spreading malicious rumour / making malicious allegations, including unwarranted allegations of harassment
   * Isolation or exclusion, including from work or social events
   1. It is important to understand that legitimate, reasonable, and constructive feedback relating to a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to harassment or bullying.
2. Harassment
   1. 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.
   1. Harassment can occur in many forms and can take place either at work or outside work. While this is not an exhaustive list, examples include:
   * "Banter", jokes, taunts, or insults that are sexist, racist, ageist, transphobic, homophobic, or derogatory against any other protected characteristic
   * Unwanted physical behaviour, for example, pushing or grabbing
   * Excluding someone from a conversation or a social event or marginalising them from the group
   * Derogatory comments about pregnancy, maternity leave, or IVF treatment
   * Mimicking or making fun of someone's disability
   * Derogatory or offensive comments about religion
   * Unwelcome comments about someone's appearance or the way they dress that is related to a protected characteristic
   * "Outing" (i.e., revealing their actual or perceived sexual orientation against their wishes), or threatening to “out", someone
   * Consistently using the wrong names and pronouns following the transition of a person's gender identity
   * Displaying images that are racially offensive
   * Excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.
   1. Harassment can also occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not.
   2. Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic, for example having a family member of a particular religion.
   3. Harassment can arise where the perpetrator did not have the intention of causing offence but does cause offence by what they say. For example, this can happen in respect of banter and jokes.

Sexual Harassment

* + 1. Harassment may be sexual in nature. Sexual harassment can occur in many forms. While this is not an exhaustive list, examples include:
  + Physical conduct of a sexual nature, unwelcome physical contact, or intimidation
  + Sexual comments or jokes, which may be referred to as “banter”
  + Displaying sexually graphic pictures, posters, or photos
  + Suggestive looks, staring or leering
  + Propositions and sexual advances
  + Making promises in return for sexual favours
  + Sexual gestures
  + Intrusive questions about a person’s private or sex life or a person discussing their own sex life
  + Sexual posts or contact in online communications, including on social media
  + Spreading sexual rumours about a person
  + Sending sexually explicit emails, text messages or messages via other social media
  + Comments about appearance or dress, innuendo, or lewd comments
  + Frequent, unwanted/unwelcomed contact or attention
  + Leering, whistling, or making sexually suggestive gestures and
  + Gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.
    1. The Worker Protection (Amendment of Equality Act 2010) Act 2023 requires employers to take reasonable steps to prevent sexual harassment in the workplace. To assess the risk of MHA colleagues being exposed to sexual harassment and determine reasonable measures that can be taken to minimise those risks, regular risk assessments are undertaken and reviewed. MHA’s risk assessment can be located at Appendix 2 of this policy.

1. Micro aggressions
   1. Micro aggressions - sometimes called micro-incivilities - 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. They are sometimes referred to as "death by a thousand cuts".
   2. Microaggressions generally take one of three forms:
   * Micro-assaults: Conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example a group being described as "those people."
   * Micro-insults: Unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability "You don't look disabled to me".
   * Micro-invalidations: Where a person denies, or seeks to cancel, the feelings and lived experiences of a marginalised individual or group, for example a white person saying, "I don't think the UK has a problem with racism - some people are just too sensitive".
   1. Serious micro-aggressions can amount to unlawful harassment, bullying or discrimination but even less serious micro-aggressions can negatively impact the health and wellbeing of the person experiencing them.
2. Procedure for Raising Concerns

Bully/Harasser is a Colleague

* + 1. Concerns about bullying and harassment between colleagues (excluding volunteers) will be handled under MHA’s Resolution Policy and Procedure which outlines informal (early resolution) and formal (formal resolution) stages.
    2. Concerns about bullying and harassment involving a volunteer will be handled under the Volunteer Problem Solving Policy and Procedure.

Bully/Harasser is a Third Party

* + 1. Whilst this policy is primarily concerned with the behaviours of colleagues and volunteers it should be noted that if anyone is subjected to, or observes others being subjected to unacceptable behaviour from a third party, including a person using our services or their family member, supplier or contractor working for MHA, we encourage you to report this to your line manager without delay.
    2. Concerns regarding the behaviour of a third party will be handled under the Unacceptable Behaviours Policy.

What to do if you Witness Bullying or Harassment

* + 1. If you witness bullying or harassment, you are encouraged to take appropriate action to address it. You should not however take any action that may put you at risk. If you feel able, you should intervene to prevent the matter continuing. If you are not able to do this, appropriate action may include offering support to the person who has been bullied or harassed, including explaining options for the colleague including reporting the incident or reporting the incident yourself.
    2. If reporting the incident, you should bring the matter to the attention of a key Speak Up contact (refer to sections 8.5 – 8.6).

1. MHA’s Speak Up, Listen Up Initiative
   * 1. Speak Up, Listen Up is part of our commitment to fostering a safe, respectful, and inclusive workplace.  The aim is to empower all colleagues to voice concerns at the earliest opportunity and for appropriate action to be taken and so contribute to the continuous improvement of our services.

Speak Up Early

* + 1. Speaking up is the first step towards positive change. If you witness or experience any form of misconduct, be that bullying, harassment, or other types of wrongdoing, please do not hesitate to speak up. Your voice is crucial in maintaining a healthy workplace culture.

We Listen and We Act

* + 1. Our commitment is not just to hear your concerns, but to take swift and appropriate action. Together we can maintain a workplace where everyone feels respected and safe.

Who to Speak Up to

* + 1. We encourage colleagues to speak up to their line managers in the first instance. Line managers play a pivotal role in creating an open environment and we expect all line managers to actively listen, address concerns promptly and cultivate a culture where our colleagues feel safe to express themselves. Where this may not feel appropriate, or where colleagues have spoken up to their line manager and are not satisfied with their response, colleagues may contact one of the people below.
    2. In addition to line managers, colleagues can speak up to a senior manager, a chaplain, our EDI Manager, EDI Networks, any member of the [Strategic Leadership Team](mailto:strategicleadershipteam@mha.org.uk) or the [HR Team.](mailto:HR@mha.org.uk)

Help, Support and Reporting Phone Line

* + 1. We also have a Speak Up, Listen Up support, advice, and reporting phoneline run by HR. If you ever feel unable to speak to your line manager, please call 01332 218479. The phone line will operate from Monday to Friday, 9am – 5pm, with a voicemail function enabled outside of those hours. Colleagues may call the phone line for advice and support without identifying themselves should they wish.

1. Support for Colleagues
   1. 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 seriously consider any requested changes to your working arrangements during our investigation into the matter.

Employee Assistance Programme (EAP)

Confidential counselling, advice and support is available through the employee assistance programme and available 24 hours a day. Colleagues can access the service by calling 0330 380 0658. The EAP offers a number of services and can advise on a wide range of both occupational and domestic related issues.

Occupational Health Support

Any colleague who is involved in a claim of bullying and harassment may find it helpful to talk to occupational health through a management referral. Please speak to your line manager or a member of the HR team.

1. Roles and Responsibilities

| Role | Responsibilities |
| --- | --- |
| **All Colleagues** | * All colleagues have a personal responsibility for their own behaviour and for ensuring that they comply with the policy. MHA expects all colleagues to: * Help promote an inclusive environment by treating everyone with dignity and respect * Familiarise themselves with the policy on Bullying and Harassment and work within its boundaries * Appropriately challenge and / or report behaviour that may be considered to be offensive when directed against themselves or others; and * Support the organisation by engaging with the informal and formal processes that challenge unacceptable behaviours in the workplace. |
| **Line Management** | * All managers have a responsibility to implement this policy and to bring it to the attention of colleagues in their work areas, in order to establish and maintain a work environment free of bullying and harassment, they must: * Set a positive example by treating others with respect and setting standards of acceptable behaviour * Promote a working environment where bullying and harassment is unacceptable and not tolerated * Treat a complaint seriously and deal with it promptly and confidentially, giving the member of staff and the alleged perpetrator full support during the whole process * Tackle and where possible, resolve any incidents of bullying, harassment before the formal process is invoked; and * Consult with the HR team for advice and support |
| **Human Resources (HR)** | * The HR team has a responsibility to ensure that the policy is followed fairly and consistently. Their duties include: * Advising managers and colleagues where individuals feel that they are being harassed or bullied in the course of their employment * Ensuring the effective implementation and embedding of the policy through education and monitoring activity * Advising managers on the applications of the policy * Monitoring incidences of bullying and harassments and initiating appropriate action * Reviewing the policy where necessary |

1. Training and Monitoring
   1. The principles of this policy will be addressed in the organisations mandatory Values and Equality and Diversity training. All new colleagues must complete the training as part of their organisational induction programme.
   2. All colleagues are required to complete annual e-learning training on bullying and harassment. This training is designed to equip colleagues with the tools to recognise, prevent and address inappropriate behaviour.
   3. Compliance is assessed through direct observation, monitoring, and supervision of our colleagues.
   4. HR will monitor and analyse data relating to concerns raised relating to bullying and harassment and will report on a regular basis to Executive Leadership Team (ELT), Quality Governance Group (QGG) and Operations Committee. HR will use the data to monitor the implementation of the policy and management of cases.
   5. In addition, the data will be collated and analysed for information to ensure the policy is being adhered to, to identify trends and any interventions required to address any problems areas. Subsequently, the data will be used to inform and improve polices, as well as provide recommendations for improving working practices.
2. Communication and Dissemination
   1. This policy is disseminated and implemented within all MHA services through MHA’s channels of communication.
   2. Each colleague’s line manager must ensure that all teams are aware of their roles, responsibilities.
   3. This policy will be available to the people we support and their representatives in alternate formats, as required.
   4. Any review of this policy will include consultation with our colleagues, review of quality audits and feedback from other agencies.
   5. Queries and issues relating to this policy should be referred to the Standards and Policy Team [policies@mha.org.uk](mailto:policies@mha.org.uk)
3. EDI Impact Assessments
   1. An Equality, Diversity, and Impact Assessment (EIA) was completed. The EIA found that the following protected characteristics could be impacted by this policy:
   * Age
   * Disability
   * Race and Ethnicity
   * Gender
   * Marriage and Civil Partnerships
   * Pregnancy and Maternity
   * Religion or Belief
   * Race or Ethnicity
   * Sexual Orientation
   * Transgender

As a result, amendments were made to the policy which are detailed in the EIA.

* 1. Further reasonable adjustments to our policies, practices, and procedures, where recommended by Occupational Health and / or Access to Work will be made if necessary.
  2. For access to the EIA, contact [policies@mha.org.uk](mailto:policies@mha.org.uk).
  3. For further information and support around reasonable adjustments, please contact a member of the HR Team at [hr@mha.org.uk](mailto:hr@mha.org.uk).

1. Resources
   1. MHA Policy Documents, Procedures, and Guidance
   * Discipline Policy and Procedure
   * Resolution Policy and Procedure
   * Volunteer Problem Solving Policy and procedure
   * Unacceptable Behaviours Policy

External Resources

* + [The Worker Protection (Amendment of Equality Act 2010) Act 2023](https://www.legislation.gov.uk/ukpga/2023/51/contents)
  + [ACAS Discrimination and Bullying](https://www.acas.org.uk/discrimination-and-bullying)

1. Appendices
   * Appendix 1 – Guidance for managers when a colleague raises a concern around bullying or harassment

Appendix 1 – Guidance for Managers when a colleague raises a concern around bullying or harassment

Handling concerns about bullying or harassment is critical for fostering a safe and respectful workplace. Swift and appropriate responses not only support the affected colleagues but also reinforce a culture of respect and accountability within your team.

**Practical Tips**

1. **Create a Safe Environment**: Ensure your office or meeting space is private and free from interruptions. This helps the colleague feel secure while sharing their concerns.
2. **Use Open Body Language**: Maintain eye contact, nod, and lean slightly forward to show you are engaged and attentive. Avoid crossing your arms or appearing distracted.
3. **Practice Active Listening**: Give your full attention, refrain from interrupting, and paraphrase what they say to show understanding. For example, “It sounds like you felt very uncomfortable during that interaction.”
4. **Acknowledge Their Feelings**: Validate their emotions by saying things like, “It’s understandable to feel that way,” or “That sounds very difficult.” This helps them feel heard and respected.
5. **Be Patient**: Allow them to express themselves at their own pace. If they’re struggling to share, gently encourage them with phrases like, “Take your time; I’m here to listen.”
6. **Avoid Making Assumptions**: Ask open-ended questions rather than making assumptions about their experience. For example, “Can you tell me more about what happened?” rather than, “Was it just a misunderstanding?”
7. **Offer Support Options**: Let them know what support is available, such as accessing the Employee Assistance Programme, Occupational Health or mediation options.
8. **Reassure Confidentiality**: Emphasise that their concerns will be treated confidentially and that you’ll discuss next steps only with necessary parties.
9. **Document Everything**: Keep detailed records of all conversations, including dates, times, and the specifics of the allegations. This documentation is crucial for any future investigation.
10. **Follow Up**: After the initial conversation, check in with them regularly to see how they’re doing and if they need further support. This shows ongoing care and concern.
11. **Be Transparent About Next Steps**: Clearly communicate the actions you’ll take following the conversation, including timelines and who will be involved. This helps manage their expectations.
12. **Respect Their Choices**: Understand that they may have different comfort levels regarding how to proceed. Respect their wishes and discuss the approach they would like to take but consider where MHA has a responsibility to act. Seek advice from the HR Team if you are unsure.

**Questions to Ask**

1. **Can you share what happened in detail?** (Encourage them to provide a narrative including covering dates / location / how events happened in order / what was said or done and by whom / were there any witnesses colleagues or others)
2. **How did this situation make you feel?** (Understanding emotional impact is key.)
3. **Have you experienced this behaviour before, or is this the first time?** (Assess the context and frequency.)
4. **What would you like to see happen as a resolution?** (Empower them by involving them in the solution.)

Appendix 2 – MHA’s Prevention of Sexual Harassment Risk Assessment

|  |  |
| --- | --- |
| **Assessment Details** | |
| **Date of Assessment** | 18/12/24 |
| **Risk Assessment Reference** | Sexual Harassment |
| **Risk Assessor** | Cathryn Taylor, Head of People |
| **People involved in making this assessment** | Cathryn Taylor, Head of People  Michelle Heath, Head of Standards and Policy  Emma Basham, Head of Risk Management |
| **People at Risk** | All MHA colleagues |
| **Risks Identified** | |
| **Risks identified of colleague to colleague sexual harassment** | * Lack of Awareness and Training: Insufficient training on sexual harassment can leave colleagues unaware of what constitutes inappropriate behaviour. A lack of clear policies or guidelines can further exacerbate the problem, making it difficult for colleagues to recognise and report sexual harassment. * Workplace Culture: A workplace culture that tolerates or dismisses inappropriate jokes or comments can normalise sexual harassment. If colleagues observe colleagues engaging in or laughing at such behaviour without consequence, they may feel emboldened to act similarly, increasing the risk of harassment. * Remote Work and Digital Communication: Hybrid working for some central support colleagues has shifted some interactions to digital platforms, where harassment can also occur through emails, messaging apps, or video calls. The anonymity of digital communication may embolden some individuals to engage in inappropriate behaviour, which can be challenging to monitor and address. |
| **Risks Identified (contd.)** | |
|  | * Vulnerability of certain Groups: Certain groups, including those who may already face discrimination or marginalisation, may be at a heightened risk of experiencing sexual harassment. * Inconsistent Reporting Mechanisms: If reporting mechanisms are inconsistent or lack confidentiality, colleagues may be reluctant to come forward with their experiences. Fear of retaliation or disbelief can hinder the reporting process, allowing harassment to persist unchecked. * Power Dynamics and Hierarchical Structures: Hierarchical relationships can create an imbalance of power. Colleagues may feel pressured to tolerate inappropriate behaviour from colleagues they perceive to be of “higher standing”, fearing repercussions for reporting incidents. This dynamic can lead to a culture of silence, where victims hesitate to come forward. |
| **Risks identified of third party sexual harassment** | Third-party sexual harassment presents unique challenges and risks that can significantly impact the workplace environment. This form of harassment involves individuals who are not direct colleagues—such as clients, vendors, contractors, or visitors—engaging in inappropriate behaviour toward MHA colleagues. The following are examples of how third-party sexual harassment may for MHA colleagues:   * **Residents/visitors/family members**: Many roles within MHA are likely to include regular interaction with residents, family members and other visitors. This presents a risk that the visitors or family members could make inappropriate comments or advances during meetings or may engage in unwanted flirting or share inappropriate jokes, crossing professional boundaries. * **Other third party interactions/relationships**: Some roles, such as Estates, include regular interaction with third party contractors. This presents a risk that the third party could make inappropriate comments or advances during meetings or may engage in unwanted flirting or share inappropriate jokes, crossing professional boundaries. |
| **Risks Identified (contd.)** | |
|  | * **Networking events**: Some colleagues attend industry events or conferences, at which they may face unwanted attention or inappropriate behaviour from third parties. * **Delivery/Service personnel**: Delivery or service personnel may make inappropriate comments or gestures to colleagues while on the premises at MHA premises. * **Social media interactions**: Third parties may send unsolicited messages or engage in harassment via social media platforms. * **Phone Calls**: Harassing phone calls from third parties to colleagues. |

| **Control Measures** | |
| --- | --- |
| **Reasonable steps to be taken to reduce risk** | To foster a safe and respectful work environment at MHA central support, it is essential to implement a comprehensive strategy aimed at reducing the risk of sexual harassment. The following steps outline reasonable actions that are being taken:   * **Mandatory e-Learning on Bullying and Harassment**: All MHA colleagues are required to complete and e-learning module via The Learning Zone which focusses on understanding bullying and harassment, including sexual harassment. This training aims to educate colleagues on recognising inappropriate behaviour, understanding their rights, and learning how to respond effectively. * **Clear Policy and Reporting Procedure**: The MHA Bullying and Harassment Policy, updated December 2024, clearly outlines unacceptable behaviours, the consequences of such actions, and the process for reporting incidents. This policy is easily accessible to all colleagues via MHA Connect and in policy manuals within services and is communicated regularly to ensure everyone is aware of their rights and responsibilities. The reporting procedure is clear and straightforward, allowing colleagues to report incidents without fear of retaliation or stigma. * **Zero-Tolerance Approach led by senior colleagues**: A strong commitment to a zero-tolerance approach is demonstrated by senior leadership and management (ELT and SLT). Members of ELT and SLT are expected to role model respectful behaviour, actively promote a positive workplace culture, and take immediate action in response to any reports of harassment. Their visible support will reinforce the seriousness of the issue and encourage all colleagues to uphold these standards. * **Zero-tolerance approach led by service managers:** Service managers (including Head of Service, Home, and Scheme Managers) will actively demonstrate a zero-tolerance stance by responding promptly to reports of harassment and reinforcing behavioural expectations in line with MHA’s Behavioural Framework. Service managers will use team meetings in operational settings to discuss respect in the workplace, share policy updates, and encourage open dialogue. * **Key Reporting Contacts**: MHA has identified key speak up contacts who will handle reports sensitively and confidentially, ensuring colleagues feel safe and supported when coming forward. Regular communication about these contacts will ensure that all staff members are aware of who to approach in case of incidents. * **Dedicated Speak Up, Listen Up Phone Line**: MHA Central Support colleagues are able to call the dedicated speak up, listen up phone line, allowing colleagues to seek advice, support, or report incidents of harassment anonymously if desired. This confidential resource creates a safe avenue for colleagues to voice their concerns and will be monitored by the HR Team. * **External support** available for all colleagues via Protect, independent external whistleblowing charity. * **Feedback and continuous improvement**   Commitment to Regular "Your Voice" Surveys: MHA will regularly assess the workplace environment by implementing "Your Voice" surveys. These surveys will specifically ask colleagues about their experiences related sexual harassment. By creating an ongoing dialogue about these issues, we can gather valuable insights, identify trends, and address concerns proactively. The results of these surveys will be shared transparently, demonstrating our commitment to fostering a safe and supportive workplace.  Exit interviews MHA will ensure provision for colleagues to raise concerns relating to sexual harassment, anonymously should they wish, in exit interview discussions. Feedback will be identifiable at a home level and will be shared with the HR Lead, Area Managers and Regional Directors.  After any reported incident, the relevant service lead, supported by HR, conduct a review to identify gaps in existing measures and strengthen protocols. |
| **Assessment Review Date** | Risk Assessment to be reviewed at the next policy review date or before if any changes or amendments are required |

1. Version Control

| Version | Version Date | Revision Description / Summary of Changes | Author | Next Review Date |
| --- | --- | --- | --- | --- |
| 7 | December 2024 | Refreshed policy to include:   * Detailed examples of bullying and harassment * Micro-aggressions * MHA’s Speak up, Listen up initiative and key contacts * Reference to resolution policy and procedure * Branding compliance | * Head of People * Standards and Policy Manager * People Panel * EDI Manager * EDI Networks * HR Team * Head of Volunteering and Support Services | November 2026 |