



# 14. Harassment And Bullying

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As part of the Company's overall commitment to equality of opportunity and diversity, it is fully committed to promoting a fair and harmonious working environment in which everyone is treated with respect and dignity and in which no individual feels bullied, threatened or intimidated. The aim of this policy is to prevent harassment and bullying in the workplace which includes harassment and bullying by other workers or by third parties during the course of an employee doing his or her job.

Harassment or bullying at work in any form are unacceptable behaviour and will not be permitted or condoned and will be viewed as a gross misconduct offence which may result in dismissal without notice.

## 14.1 What Is Harassment and Bullying

Harassment and bullying detract from a productive working environment and can impact on the health, confidence, morale and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behaviour.

### 14.1.1. Definition of Harassment

Harassment is any unwanted physical, verbal or non-verbal conduct based on sex, sexual orientation, marital or civil partnership status, gender reassignment, religious belief, age, dignity of anyone at work or creates an intimidating, environment.

A single incident of unwanted or offensive behaviour can amount to harassment. Some examples are given below, but many forms of behaviour can constitute harassment. These examples are:

- Physical conduct, ranging from touching, pushing or grabbing to punching or serious assault;
- Verbal or written harassment through jokes, offensive language, defamatory remarks, gossip, threats or letters;
- Unwelcome sexual behaviour, including unwanted suggestions, propositions or advances;
- The sending or displaying of material that is pornographic or obscene, including emails, text messages, video clips, photographs, posters, emblems or any other offensive material;
- Isolation, non-co-operation at work or exclusion from social activities;
- Coercion, including pressure for sexual favours;
- Inappropriate personal contact, including intrusion by pestering or spying.

It should be noted that it is the impact of the behaviour that is relevant and not solely the motive or intent behind it.

#### **14.1.2. Definition of Bullying**

Bullying is persistent, offensive, abusive, intimidating or insulting behaviour, which, through the abuse of power, makes the recipient feel upset, threatened, humiliated or vulnerable.

Bullying can be a form of harassment and can undermine an individual's self-confidence and self-esteem and cause them to suffer stress.

Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- Shouting at or humiliating others;
- High-handed or oppressive levels of supervision;
- Unjustified, offensive and/or insulting remarks about performance;

- Excluding employees from meetings, events or communications without good cause;
- Physical or emotional threats.

Bullying can occur in the workplace and outside of the workplace at events connected to the workplace, such as social functions or business trips.

#### **14.1.3. Third Party Harassment**

Woodhurst is committed to protecting employees from harassment by third parties, including clients, customers, suppliers, or other individuals external to the company. Employees have the right to be treated with dignity and respect in all professional settings, both within and outside of the workplace.

If employees experience harassment from third parties, they are encouraged to report it to HR or their manager immediately, following the same procedures for reporting internal harassment. The company will investigate the issue and take appropriate action to prevent further harassment.

#### **14.1.4. Employee's Rights and Responsibilities**

Employees have the right to work in an environment which is free from any form of harassment or bullying. The Company recognises an employee's right to complain about harassment or bullying should it occur. All complaints will be dealt with seriously, promptly and confidentially.

Every effort will be made to ensure that, when an employee makes a complaint, he or she will be protected from further acts of bullying and harassment. If others also give evidence or information in connection with the complaint, they equally will be protected. Perpetrators of these acts will be subject to disciplinary action which may warrant dismissal.

Employees have a responsibility to help ensure a working environment in which the dignity of everyone is respected. All employees must comply with this policy and should ensure that his/her behaviour towards colleagues and anyone connected to the Company, does not cause offence and could not in any way be considered to be harassment or bullying.

Employees should discourage harassment and bullying by making it clear that such behaviour is unacceptable. Employees should also support colleagues who suffer such treatment and are considering making a complaint. Employees must alert a manager or HR immediately to any incident of harassment or bullying to enable the Company to deal with the matter promptly and effectively.

#### **14.1.5. Manager Responsibilities**

Managers play a critical role in maintaining a safe, respectful, and harassment-free workplace. If a manager receives a report of harassment, bullying, or third-party harassment, they are required to take immediate action by reporting the incident to HR.

Managers must treat all complaints with seriousness and confidentiality, ensuring that the employee feels supported and protected throughout the process. It is the manager's responsibility to create an environment where employees feel safe coming forward with concerns, and they must ensure that no retaliation occurs against anyone making or supporting a complaint. Managers are also responsible for cooperating fully with HR during investigations and implementing any recommended actions or interventions to prevent further issues.

Failure to address complaints appropriately may result in disciplinary action.

#### **14.1.6. The Company's Responsibilities**

Woodhurst is committed to ensuring that adequate resources are made available to promote respect and dignity in the workplace. The company will also provide appropriate training to all employees to prevent harassment and bullying. The company's proactive duty includes providing regular training and awareness programmes on the prevention of harassment, including sexual harassment, and ensuring a positive and inclusive work environment.

We will also ensure that complaints of harassment or bullying, including third-party harassment, are handled in accordance with our grievance procedures. HR will regularly review and update these policies to comply with changing legal requirements and to maintain the highest standards of employee protection.

#### 14.1.7. Reporting Procedure

Employees should report incidents of harassment or bullying to their manager or HR, following the company's grievance procedure outlined in this handbook. Complaints will be treated confidentially, and every effort will be made to protect those involved. Employees are encouraged to report incidents as soon as they occur to ensure the matter is dealt with swiftly and effectively.

Employees should report incidents of harassment or bullying to their manager or HR, following the company's grievance procedure outlined in this handbook. Complaints will be treated confidentially, and every effort will be made to protect those involved. Woodhurst is committed to ensuring that all complaints of harassment, bullying, or third-party harassment are addressed promptly, fairly, and confidentially. Employees should follow the steps below when reporting an incident:

##### 1. Reporting an Incident:

If you believe you are being harassed or bullied, or you have witnessed such behaviour, you are encouraged to report the incident to your direct manager or HR as soon as possible. If the incident involves your direct manager, you may report the issue directly to HR.

##### 2. Confidentiality:

All reports of harassment or bullying will be treated with the utmost confidentiality. Information about the complaint will only be shared with individuals who need to be involved in the investigation and resolution process. Woodhurst is committed to protecting the privacy of the reporting employee, as well as any witnesses, throughout the process. If a complaint leads to formal disciplinary action, the parties involved will be informed in line with legal and procedural requirements.

##### 3. Anonymous Reporting:

Employees who do not feel comfortable reporting harassment or bullying directly to their manager or HR may use the **Anonymous Feedback Form**, available on the [Notion](#). While anonymous reports can limit the company's ability to investigate fully, they are still taken seriously and will be reviewed by HR to determine the

appropriate action. The company encourages full disclosure where possible, to facilitate a more thorough investigation.

#### 4. Protection from Retaliation:

Woodhurst strictly prohibits any form of retaliation against an employee who reports harassment or bullying, participates in an investigation, or supports a colleague's complaint. Retaliation may include, but is not limited to, threats, demotion, exclusion from work-related activities, or negative performance reviews as a result of making a complaint. Any employee who experiences or witnesses retaliation should report it immediately. Retaliation is considered a serious violation of this policy and may result in disciplinary action, up to and including dismissal.

#### 5. Access to Support:

Employees who report incidents of harassment or bullying, or who participate in an investigation, will be offered access to support resources. HR will also provide guidance throughout the complaint process to ensure that the employee feels supported and informed about the next steps.

#### 6. Investigation Process:

Once a complaint is made, HR will begin an investigation in line with the company's procedures. The investigation will involve gathering relevant information, interviewing witnesses, and taking statements from those involved. The goal is to resolve the issue as quickly and fairly as possible. Employees will be informed of the outcome of the investigation, and appropriate action will be taken if the complaint is substantiated.

#### 7. Follow-Up:

After the resolution of the case, HR will monitor the situation to ensure that the harassment or bullying does not continue and that no retaliation occurs. Employees will be encouraged to report any further issues immediately.

By ensuring confidentiality, providing options for anonymous reporting, protecting employees from retaliation, and offering access to support services, Woodhurst aims to create a safe and supportive environment where all employees can raise concerns without fear or hesitation.

## 14.2. Monitoring

The Company will not tolerate unlawful discrimination or harassment of any kind in the working environment and will take positive action to prevent its occurrence.

The Company will monitor its policies and will implement changes in order to improve them as social attitudes and legislation change. This commitment applies to all the Company's employment policies and procedures.



### **Risk Assessment**

Harassment and Bullying Risk Assessment- Internal, Client and Third-Party