Harassment and Bullying Policy

Applies to	All employees, workers, agency workers, contractors, consultants, interns, volunteers and job applicants
Policy owner	HR Manager
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We are committed to providing a working environment where everyone is treated with dignity and respect. Bullying and harassment of any kind - whether by a colleague, a manager or a third party - will not be tolerated.

This policy applies in all work-related contexts: on our premises, on a client's site, at off-site work events, on business trips and online including on company systems and social media. It applies to acts carried out by those who work for us and by third parties such as clients, customers, suppliers and visitors.

Please read this policy alongside our Sexual Harassment Policy, Equality, Diversity and Inclusion Policy, and Grievance Policy.

This policy does not form part of your contract of employment. We reserve the right to amend it.

1. What is bullying?

Bullying is unwanted behaviour that is offensive, intimidating, malicious or insulting, or that represents an abuse or misuse of power that undermines, humiliates or causes physical or emotional harm to another person.

Bullying can take many forms - it does not have to be obvious or dramatic. Examples include:

- spreading malicious rumours about someone
- consistently putting someone down or undermining their confidence
- deliberately giving someone an unfair workload or setting them up to fail
- excluding someone from team conversations, meetings or social events
- making fun of or mocking someone, in person or online
- refusing to cooperate with or ignoring a colleague

Bullying can be a pattern of behaviour or a single serious incident. It can happen face to face, by phone, in writing or online. It does not always involve someone more senior acting against someone more junior - it can run in any direction, including upwards.

Constructive and fair feedback from a manager or colleague about your behaviour or performance is not bullying. It is a normal and necessary part of working life.

2. What is harassment?

Harassment occurs when someone is subjected to unwanted behaviour related to a protected characteristic that has the purpose or effect of violating their dignity, or of creating an environment that is intimidating, hostile, degrading, humiliating or offensive.

The protected characteristics for the purposes of harassment law are: age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation. Marriage and civil partnership, and pregnancy and maternity, are not included in harassment law but are protected under other discrimination provisions.

Harassment is unlawful under the Equality Act 2010. It can take many forms - name-calling, offensive jokes, exclusion, lewd comments, unwanted physical contact, and displaying offensive material are all examples.

A few important points

Behaviour can amount to harassment even if the person doing it did not intend harm - what matters is the effect on the person on the receiving end. Behaviour can also amount to harassment even if the person being harassed does not ask for it to stop or raise a complaint.

The law also protects people from harassment based on a characteristic they are believed to have but do not, and from harassment because of the characteristic of someone they are associated with.

On sex and gender reassignment

Under current equality law, the protected characteristic of sex refers to biological sex. This means that a trans woman, for example, falls under the legal definition of a man for the purposes of sex-based protections. We want to be clear that this does not in any way reduce the protection our trans colleagues are entitled to in this workplace. Trans women and trans men are fully protected from harassment related to the protected characteristic of gender reassignment, whether or not they are undergoing or have undergone any surgical or medical transition. They are also protected from sex-related harassment based on their perceived sex or their association with it.

Sexual harassment is dealt with separately in our Sexual Harassment Policy.

3. Victimisation

Victimisation occurs when someone is treated less favourably because they have raised a complaint of harassment or bullying, supported a colleague who has done so, or are suspected of intending to do either of those things.

We do not tolerate victimisation in any form. Anyone found to have victimised a colleague for raising or supporting a complaint will face disciplinary action.

4. Third-party harassment

Our commitment to a harassment-free workplace extends to acts by third parties - including clients, customers, suppliers and visitors. You are encouraged to report any third-party harassment you experience or witness.

We take active steps to prevent third-party harassment and keep our risk assessment under regular review.

Under the Employment Rights Act 2025, from October 2026, employers face direct liability for third-party harassment in connection with all protected characteristics. We are committed to meeting that standard now, not only when it becomes a legal requirement.

If you have ideas about how our protection against third-party harassment could be improved, please speak to your line manager.

Where third-party harassment occurs, we will investigate, take action to prevent a recurrence - which may include banning the individual from our premises or reporting criminal acts to the police - and support the employee involved.

5. Expected standards of conduct

We expect everyone who works for or with us to treat others with respect and dignity at all times, whether face to face, by phone, in writing or online. The following behaviours are not acceptable in our workplace:

- offensive language, gestures or material of any kind, whether directed at someone or not
- jokes or comments that could be hurtful or offensive
- deliberately excluding colleagues from discussions, decisions or events
- aggressive, intimidating or threatening language or behaviour
- mocking, mimicking or belittling a colleague
- spreading rumours or gossip about colleagues
- invading a colleague's personal space

These standards apply wherever work-related conduct takes place - including at social events, on business trips, and on social media. They apply to behaviour directed at colleagues as well as to behaviour directed at others outside work where it affects your suitability to carry out your role.

6. If you are being bullied or harassed

If you are experiencing bullying or harassment, there are several ways you can respond.

Informal approach

In some cases, the most effective first step is to speak directly to the person concerned and make clear that their behaviour is unwelcome and must stop. People do not always realise the impact of their behaviour, and a direct conversation sometimes resolves the issue without the need for a formal process.

If you are not comfortable approaching the person yourself, or if a direct approach has not worked, speak to your line manager informally. If the issue involves your line manager, speak to their manager or contact the HR Manager directly.

Formal complaint

If informal steps are not appropriate or have not resolved the matter, you can raise a formal complaint under our Grievance Policy. We will treat your complaint seriously and in confidence, investigate promptly and fairly, and take appropriate action.

Anyone accused of bullying or harassment will be treated fairly. They will be told what has been alleged, given a proper opportunity to respond before any decision is made and supported through the process. A complaint is not a finding - our role is to establish the facts fairly for everyone involved.

We may need to separate you from the person you are complaining about during the investigation. This is not a pre-judgement of your complaint - it is simply to protect everyone involved while the facts are established.

If your complaint is not upheld, we will explain why. Regardless of the formal outcome, we will consider what steps can be taken to improve working relationships and prevent future issues.

If you witness concerning behaviour

If you see behaviour that may amount to bullying or harassment, you can challenge it directly if you feel safe doing so. If you do not feel comfortable challenging it yourself, please report it to your line manager, the HR Manager or a Senior Director.

7. If you change your mind about a complaint

If you raise a concern - formally or informally - and later decide you do not want to proceed, we will discuss that with you and take your wishes seriously. However, we may decide it is necessary to investigate further in order to fulfil our duty to protect everyone in the workplace. We will always talk to you before making that decision.

8. Confidentiality

We will handle all complaints of bullying and harassment with discretion. Details will only be shared with those who need to know for the purposes of the investigation. All parties involved - whether raising a complaint, being investigated or acting as a witness - are expected to maintain confidentiality throughout and after the process. This does not prevent anyone from seeking support, taking advice, or making a protected disclosure under our Whistleblowing Policy.

A breach of confidentiality in connection with a bullying or harassment complaint is a serious disciplinary matter.

Records relating to complaints may be kept on personnel files and will be handled in line with our Data Protection Policy.

9. Consequences of breaching this policy

Any breach of this policy will be dealt with under our Disciplinary Policy. Bullying or harassing a colleague, victimising someone who has raised a complaint, making false allegations in bad faith, and providing misleading information during an investigation are all disciplinary matters that may result in dismissal for gross misconduct.

Aggravating factors - such as abuse of a position of power over a more junior colleague - will be taken into account when deciding on the appropriate outcome.

10. Questions and administration

The HR Manager is responsible for administering this policy. If you have any questions, please speak to your line manager in the first instance or contact suebailey@ansteyhorne.co.uk.

Related policies: Sexual Harassment Policy – Equality, Diversity and Inclusion Policy - Grievance Policy - Disciplinary Policy - Whistleblowing Policy - Data Protection Policy

This policy does not form part of any contract of employment.