Harassment, Bullying & Victimisation Policy

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Harassment, Bullying & Victimisation Policy

Part of the Company's Respect at Work Framework

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Harassment, Bullying & Victimisation Policy

Policy Statement

The Company is committed to creating and maintaining a working environment where everyone is treated with dignity, courtesy and respect.

We will not tolerate harassment, bullying or victimisation of any kind. Any behaviour that undermines a person's dignity, causes humiliation, intimidation or distress, or creates an intimidating, hostile, degrading, humiliating or offensive environment is unacceptable.

This policy applies to all employees, workers, agency or casual workers, contractors, volunteers, interns, and apprentices. It applies in depots, yards, workshops, offices, customer or supplier sites, shared vehicles, accommodation used during work travel, training environments, conferences, work social events, and all online or digital environments connected to work, including but not limited to WhatsApp, Microsoft Teams, text messages, email and other messaging platforms used for work purposes.

We recognise that some parts of our business may present a higher risk of harassment, bullying or victimisation, including lone working, overnight travel, agency labour, customer-facing roles, site-based operations, workshop and yard environments, and situations where power imbalance may exist. We are committed to taking proactive steps to identify and reduce those risks.

In line with our legal obligations, we are committed not only to responding to concerns when they are raised, but also to taking all reasonable steps to prevent harassment, including harassment by third parties.

The Policy is communicated to employees through publications, communications and training such as onboarding programmes and regular anti-harassment awareness training. The policy should be read in conjunction with the Vp Group's wider policies.

Failure to follow this policy, or committing, authorising, condoning, or failing to act appropriately in relation to harassment, bullying or victimisation may result in disciplinary action under the Company Disciplinary Policy, up to and including dismissal.

This policy does not form part of any employee's contract of employment, and we reserve the right to amend or withdraw it at any time.

This policy forms part of the Company's wider Respect at Work framework, which promotes dignity, fairness and inclusion across the organisation.

It should be read alongside the following policies and procedures:

- Dignity at Work Statement
- Equality, Diversity & Inclusion Policy
- Sexual Harassment Policy
- Grievance Policy
- Disciplinary Policy
- Whistleblowing Policy

Policy Aims

- Ensure everyone understands what harassment, bullying and victimisation are and can openly and confidently discuss concerns about inappropriate behaviours in the workplace.
- Ensure that the Company policy and practices are clear, and our stance is that we will not tolerate any form of harassment, bullying or victimisation which creates a physical or psychologically unsafe environment.
- Educate managers about the signs, impact and risks of harassment, bullying and victimisation in the workplace, and how they can support individuals at work.
- Reinforce our commitment to take prompt and appropriate action in response to any allegations of harassment, bullying or victimisation.
- Demonstrate our commitment to taking proactive measures to help create a culture of dignity and respect where all employees feel safe from harassment, bullying and victimisation in the workplace.
- Ensure employees understand this policy applies in both office and operational environments such as depots, yards, workshops, customer sites and during travel.
- Provide clear reporting routes and ensure employees feel confident that concerns will be taken seriously and that they can speak up without retaliation.
- Support the Company to meet its legal obligations by identifying high-risk situations and taking targeted steps to reduce the risk of inappropriate behaviour occurring.

What is Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Protected characteristics under equality law include age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation. Behaviour related to other protected characteristics such as pregnancy, maternity or marriage and civil partnership may still amount to unlawful discrimination.

Harassment can be verbal, non-verbal, written, physical, visual or online. It can happen face-to-face, on the telephone, in written notes, by email, on messaging platforms such as WhatsApp or Microsoft Teams, in toolbox talks, in depots, yards, workshops, offices, shared vehicles, hotels, client locations, social events related to work or any other setting connected to work.

The person displaying the unwanted behaviour does not have to intend to harass the other person for the behaviour to be considered harassment. The unwanted behaviour should therefore be considered in light of its nature, the circumstances in which it occurred, and the impact on the person who experienced it.

A single incident can amount to harassment.

A person may be harassed even if they were not the intended target. For example, a person may be harassed by offensive "banter" in a workshop, racist or sexist comments made during a toolbox talk, offensive memes or images shared in a WhatsApp group, or derogatory comments made in a yard or depot where others can hear them.

It is important to note that just because someone does not object to inappropriate behaviour at the time, that does not mean they are okay with it, or it is acceptable. A person may not object at the time

because they feel intimidated, embarrassed, isolated, concerned about how they will be viewed, worried about losing opportunities, or because there is a power imbalance between them and the person responsible.

You may experience harassment from anyone you encounter as part of your role, including a colleague, agency worker, supervisor, line manager, contractor, customer, supplier, visitor, member of the public or someone in a position of authority or influence. It can be carried out by anyone of the same or a different gender, and every individual's experience is unique to them.

Some behaviour may also amount to discrimination under the Equality Act 2010, and concerns of this kind may also be considered under the Equality, Diversity & Inclusion Policy.

What is Bullying

> Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that is intended to undermine, humiliate, denigrate or injure another person.

Bullying does not need to relate to a protected characteristic. However, where it does, it may also amount to harassment and/or discrimination.

Bullying can be obvious and direct, or subtle and repeated over time. It may involve a pattern of behaviour, but one serious incident may also amount to bullying depending on the circumstances and the effect on the individual.

Legitimate and reasonable management action, carried out fairly, respectfully and appropriately, does not in itself amount to bullying. This may include setting performance standards, addressing conduct issues, changing duties for legitimate business reasons, managing attendance, or giving constructive feedback. However, management action that is carried out aggressively, inconsistently, humiliatingly or in a way designed to intimidate may amount to bullying.

Inappropriate Conduct / Behaviour

Any incident of harassment or bullying can cause long-lasting and significant distress to an individual. Behaviours which may be considered harassment or bullying, and can result in disciplinary action up to and including dismissal, are given below. This is not an exhaustive list.

- Derogatory, offensive or insulting comments about a person's age, race, ethnicity, nationality, accent, disability, religion, belief, sex, sexuality, trans status, pregnancy, maternity, marital status or any other personal characteristic.
- Mocking, mimicking or ridiculing someone's speech, appearance, health condition, learning style, communication style, working style, background or beliefs.
- Offensive jokes, "banter", teasing, practical jokes or comments that humiliate, isolate or intimidate another person.
- Shouting at, swearing at, belittling or humiliating someone in a depot, yard, workshop, office, vehicle, site or online meeting.
- "Calling out" someone in a demeaning way in front of others, including during toolbox talks, team briefings, operational meetings or online meetings.
- Repeatedly interrupting, talking over, dismissing or trivialising someone in a way that undermines them.
- Deliberately excluding someone from key work conversations, toolbox talks, communications, shift information, WhatsApp groups, Teams channels, meetings, opportunities or social interaction.
- Spreading rumours, gossip or malicious allegations about a colleague.

- Deliberately undermining a person's work, technical competence or professional reputation.
- Persistent unfair criticism, especially where it is intended to damage confidence rather than support improvement.
- Setting unreasonable workloads, impossible deadlines or unrealistic expectations for improper reasons.
- Deliberately withholding information, access, tools, vehicles, equipment, training, support or sign-off in a way designed to make someone fail or feel humiliated.
- Ignoring or freezing someone out or encouraging others to do so.
- Aggressive gestures, threatening behaviour, invading personal space, blocking movement or using physical presence to intimidate someone.
- Misuse of authority, seniority, status, experience, technical knowledge or influence to dominate, intimidate or silence another person.
- Using a person's agency worker status, junior status, new starter status, apprenticeship status, minority status or lack of confidence to target or exploit them.
- Offensive or inappropriate messages, comments, images, GIFs, memes, videos, voice notes or jokes shared via WhatsApp, Teams, text, email or other communication channels connected to work.
- Sharing or circulating photographs or recordings of colleagues without permission where this causes humiliation, embarrassment or distress.
- Behaviour at overnight stays, hotels, airports, client dinners, overseas travel or work social events that would be unacceptable in the normal workplace.
- Public-facing employees being expected to "put up with" abusive, aggressive, humiliating or discriminatory treatment from customers, clients or members of the public.
- Retaliating against someone because they challenged behaviour, raised a concern, acted as a witness, refused to join in, or supported another person.

It is important to recognise that people will have different experiences, backgrounds, views, feelings and levels of confidence about certain matters. Something that one person finds humorous can be humiliating, hostile or intimidating to another, whether it was intended or not. Employees should therefore avoid jokes, comments or "banter" which may be offensive to others.

The following provides a guide on areas that may be considered unacceptable topics for jokes, comments or "banter" in the workplace. This is not an exhaustive list.

- **Legally unacceptable** – age, race, religion or belief, disability, sex, gender reassignment, sexual orientation, marriage or civil partnership, pregnancy or maternity, fixed-term or part-time worker status, and trade union membership or non-membership.
- **Socially unacceptable:**
    - social background,
    - job role, work history, department or skill level,
    - literacy, education or confidence,
    - working pattern/arrangements,
    - accent or manner of speaking,
    - communication style or thinking style,
    - mental health or wellbeing,
    - physical appearance or dress sense,
    - generational differences,
    - agency worker status,
    - length of service,
    - perceived "fit" in a male-dominated environment.

Victimisation

> Victimisation occurs where a person suffers a detriment because they have done, or are believed to have done, a protected act, such as raising a complaint, supporting another person's complaint, giving evidence, or participating in an investigation or legal process connected to equality law.

Victimisation may include:

- Denying someone an opportunity because it is suspected that they intend to make a complaint about harassment, bullying or discrimination.
- Excluding someone because they have raised a grievance or concern.
- Treating someone as disloyal or troublesome because they accompanied another employee to a grievance meeting.
- Failing to allocate work, overtime, training, or promotion opportunities because someone spoke up.
- Dismissing someone or otherwise disadvantaging them because they gave evidence on behalf of another employee.

Victimisation will not be tolerated and may lead to disciplinary action up to and including dismissal.

Third Party Harassment

Third-party harassment occurs where a person is harassed by someone who does not work for Vp plc, but with whom they have come into contact during the course of their employment. Third-party harassment could include unwelcome or offensive conduct from clients, customers, contractors, suppliers, visitors or members of the public.

Employees should never feel expected to tolerate abusive, discriminatory or inappropriate behaviour from customers, clients or other third parties. Any such behaviour should be reported so that appropriate action can be taken.

It may occur in depots, yards, workshops, offices, customer premises, shared transport, on the telephone, online, during delivery or collection activity, while travelling or while staying away for work. Third-party harassment will not be tolerated. The Company will take all reasonable steps to prevent harassment of our employees by third parties during the course of their employment.

All employees should report any third-party harassment they experience or witness, so that appropriate action can be taken.

If any third-party harassment of an employee occurs, we will take steps to remedy complaints and to prevent it happening again. These may include warning the third party about their behaviour, ending visits, reallocating contacts, refusing service where appropriate, banning them from our premises, escalating concerns to their employer, altering working arrangements, or reporting criminal acts to the police.

Any harassment by a member of staff against a third party may also lead to disciplinary action up to and including dismissal.

Preventing Harassment – Our Proactive Duty

Vp plc is committed to taking proactive steps to prevent harassment, bullying and victimisation, rather than relying only on complaints being made after harm has occurred.

In line with our legal duties we will take all reasonable steps to prevent harassment by third parties. What is reasonable will depend on a number of factors including the working environment, and the risks identified.

Those steps may include:

- Identifying areas of the business where there is greater risk, including lone working, overnight travel, customer-facing roles, depots, yards, workshops, site-based work, online communication channels and male-dominated teams.
- Considering where power imbalance exists, including between line managers and team members, experienced employees and new starters, qualified employees and trainees, permanent employees and agency workers, majority and minority groups, and operational leaders and junior staff.
- Setting clear behavioural expectations in all work settings, including toolbox talks, messaging groups, shared vehicles, travel, accommodation and social events.
- Making sure reporting routes are known, accessible and trusted by all employees, workers and agency workers.
- Taking action when patterns, hotspots or repeat behaviours are identified.
- Reviewing team culture through available information such as complaints, grievance themes, surveys, exit interviews, return-to-work meetings and HR data.
- Training employees, managers and leaders on expected standards, reporting routes, bystander action and how to respond to concerns.
- Communicating standards of behaviour to third parties, including customers, clients, visitors and contractors.
- Reviewing the effectiveness of policies, training and preventative measures on an ongoing basis.
- Taking additional targeted steps in higher-risk parts of the business.

The Company may take action on concerns even where no formal complaint is made, where this is necessary to protect individuals, manage risk, meet our duty of care or comply with legal obligations.

The Company may also take action where patterns, themes or risks are identified through complaints, workforce feedback, surveys, exit interviews or other organisational information.

Duties & Responsibilities

We expect everyone to take responsibility for being aware of, preventing, reporting and dealing with harassment, bullying and victimisation.

Employees

All employees have a responsibility to treat colleagues, workers and all other individuals they interact with in the course of their duties with dignity and respect at all times, supporting a safe working environment and culture where harassment, bullying and victimisation are not tolerated. Employees are expected to:

- Uphold the Company values & behaviours.
- Ensure they have fully read and understood this policy, asking questions if they are unsure.
- Ensure they understand what harassment, bullying and victimisation are and be aware of how their behaviour may affect others.
- Avoid jokes, comments, “banter”, images, messages or behaviour that may reasonably be offensive or intimidating to others.
- Challenge inappropriate behaviour where it is safe to do so, including supporting colleagues who may be affected and reporting concerns where necessary.

- Intervene appropriately where safe, including calling out behaviours at the time they happen, taking steps to defuse situations, supporting those impacted, signposting individuals to reporting channels and checking in with the recipient afterwards.
- Report all incidents of harassment, bullying or victimisation when experienced or witnessed, or support recipients in reporting their experience. This should be completed without delay to enable the necessary support to be provided to the individual and appropriate action to be taken.
- Cooperate in any investigations into alleged harassment, bullying or victimisation.
- Maintain confidentiality and act sensitively if involved in any complaint or investigation.

Managers

In addition to the employee responsibilities above, all those with line management responsibility must:

- Ensure that all employees and workers within their area of accountability are:
  - treated with dignity and respect
  - aware of this policy and understand their own and the business' responsibilities.
- Role model acceptable behaviour at all times. Always challenge unacceptable or questionable behaviour that they witness or become aware of.
- Be aware of behaviour and language that can be dismissed as "banter" but may be harmful or exclusionary, and ensure standards are maintained at all times.
- Be alert to warning signs, including exclusion, silence, repeated "jokes", avoidance, reluctance to work with specific individuals, unusual absence patterns, high turnover or concerns raised informally.
- Respond swiftly, sensitively and objectively to all complaints and concerns and escalate matters to HR Advisor / HR Business Partnering team.
- Consider whether temporary adjustments are required to protect an individual while concerns are looked into.
- Identify higher-risk areas in their teams and work with HR and senior managers to put proportionate preventative measures in place.
- Ensure no individual is disadvantaged because they have raised or supported a concern.

Individuals in a position of authority

All individuals in a position of authority or where a power imbalance exists, such as line managers, directors, heads of departments, mentors to students, trainers, qualified employees to trainees, long-serving employees to new starters, senior employees to junior employees, permanent employees to agency workers, and employees in a majority group to those in a minority group, must be aware of the imbalance of authority / unequal relationships in the workplace and are expected to:

- Be aware of, and not take advantage of, the potential power imbalance and the vulnerability this can create.
- Never use their position, experience, influence or access to opportunities to intimidate, pressure, silence, exclude or undermine others.
- Ensure those in a lower position of power are not subjected to inappropriate behaviours, "banter", exclusion or retaliation due to their position.
- Be aware of vulnerabilities of minority groups who may be at greater risk of harassment, bullying or victimisation.
- Act promptly where they become aware of concerns, even if no formal complaint has yet been made.

Senior Leaders (EXCO)

In addition to the above, the Senior Leaders in the business are responsible for:

- Ensuring that there are sufficient resources and reporting structures across the business to report concerns and investigate allegations.
- Ensuring that sufficient resources are available to support the emotional and physical wellbeing of all employees affected by harassment, bullying or victimisation.
- Ensuring that high-risk environments and trends are regularly reviewed and appropriate actions are taken in areas of concern.
- Reinforcing expected standards through visible leadership and accountability.
- Ensuring managers are equipped and held accountable for culture, conduct and policy compliance.

Group HR Director & HR Team

Have a responsibility to:

- Ensure that all policies and procedures are reviewed on a regular basis.
- Ensure all cases are dealt with promptly and in a fair and consistent manner.
- Support managers in implementing this policy effectively.
- Regularly review data and report on any trends or areas of concern to Senior Leaders.
- Report on learnings from cases and identify steps to prevent issues happening again.
- Keep under review changes in law and guidance and update the policy framework accordingly.

Reporting Procedures

Any concerns should normally be raised with your line manager in the first instance. If the matter concerns your line manager, you should raise it with the next manager in line. You should however choose the method you feel most comfortable with, and this could include:

- Line Manager or another manager within the Group.
- A colleague or another employee.
- HR Team
- Mental Health First Aider

If you are not certain whether an incident or series of incidents amounts to harassment, bullying or victimisation, you should initially contact your line manager, a more senior manager, or the HR Team informally for confidential advice.

Concerns do not have to be raised formally. Just speaking with someone may assist you in taking action or receiving support to help promptly resolve the concerns.

Employees are encouraged to raise concerns as early as possible so that the Company can take appropriate action and prevent behaviour from escalating or being repeated.

In some circumstances, particularly where there may be a wider risk to others and the Company has a duty of care to act on the information disclosed, we may need to take action even if the person raising the concern does not wish to make a formal complaint. In these situations we will seek to protect confidentiality as far as reasonably possible. Each situation will be considered on a case-by-case basis, and a decision will be made following a review of the information held at the time.

Informal Steps

If you believe you are being harassed or bullied, you should consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome, is inappropriate or makes you uncomfortable, and that it must stop.

If this is too difficult, inappropriate or unsafe, you should follow the reporting procedures above and speak to someone who can provide advice and assistance in resolving the issue informally.

Informal action may include a direct conversation, support from a manager or HR, reminding an individual of expected standards, mediation where appropriate, or steps to minimise contact.

If this action does not resolve the issue, or if the matter is too serious for informal resolution, you should follow the formal procedure below.

Raising a Formal Complaint

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. Please see below and also refer to the Company Grievance Procedure.

To make a formal complaint about harassment, bullying or victimisation, you should submit it in writing to your line manager. If the matter concerns your line manager, you should submit it to the next manager in line. If for any reason you are unable to approach your line manager or a more senior manager, you can send it to the HR Team.

Your written complaint should set out full details of the conduct in question, including the name of the person or people involved, the nature of the conduct, the date(s), time(s) and location(s) at which it occurred, the names of any witnesses, any messages, images, emails or other material relevant to the complaint, any action taken so far to attempt to stop it from occurring, and the impact the behaviour has had on you.

As a general rule, the decision whether to progress a complaint is up to you. However, we have a duty to protect all employees and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

Formal Investigations

Following the receipt of a complaint:

- An appropriate Manager will be allocated to the case and will investigate the complaint in a timely, respectful and confidential manner. Individuals not involved in the complaint, or the investigation, should not be told about it.
- Where reasonably practicable, we will arrange a meeting with you, usually within 5 business days of receiving your complaint and appointing a hearing manager, so that you can give your account of events. You have the right to be accompanied by a colleague or trade union representative of your choice, who must respect the confidentiality of the investigation.
- Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation. We will also consider what additional action may be appropriate to protect you and other employees pending the outcome of the investigation.
- The Manager will also meet with the person complained about to hear their account of events. They have a right to be told the details of the allegations against them so that they can respond.
- Where your complaint is about someone other than an employee, such as a customer, supplier, visitor or member of the public, we will consider what action may be appropriate to protect you and other employees pending the outcome of the investigation, bearing in mind the reasonable needs

of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party or their organisation.

- It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
- Further meetings may be held with you or the person complained about to ask additional questions in light of any information we have gathered.
- Where relevant, the investigation may include review of WhatsApp messages, Teams communications, emails, CCTV, travel records, work logs, witness accounts or other relevant material.

Action following the investigation

- The Manager will consider all the evidence in full before informing you of their decision, either during an additional meeting or in writing. If the decision is delivered to you in a meeting, you have the same right to be accompanied as before.
- If we uphold the complaint, prompt action will be taken to address it and, if the person complained about is an employee, we may instigate the Disciplinary Procedure and the matter will be dealt with as a case of possible misconduct or gross misconduct. Disciplinary outcomes could be up to and including dismissal.
- Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange mediation, counselling, additional management support, training, or if possible, changes to duties, working location, or reporting lines of one or both parties.
- We will also consider what additional measures we may need to take as preventative measures for the future, including wider team action where concerns suggest cultural or systemic issues.
- Any employee who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of an investigation, may be subject to action under our Disciplinary Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

Appeals

- If you are not satisfied with the outcome you may appeal, within 5 business days of receiving the outcome letter. This should be done in writing setting out what aspects of the decision you are unhappy with and the reasons why. Your appeal should be addressed to the HR Team who will organise for an appropriate appeal manager, someone who has not previously been involved in the case, to hear your appeal.
- Once an appeal manager is appointed, and where reasonably practicable, they will aim to hold a meeting, normally within 5 business days, to discuss your appeal in full. You must take all reasonable steps to attend the meeting and may be accompanied by a colleague or trade union representative.
- Once full consideration has been given, the appeal manager will confirm their final decision in writing, usually within 10 business days of the appeal hearing. This is the end of the procedure and there is no further appeal.

Please note that although we aim to deal with cases in a timely manner there may be circumstances, such as complex or large cases, difficulties in appointing relevant managers, availability of witnesses, or difficulties in diary management, where delays cannot be avoided. If this is the case, we will communicate this to you.

Support for those affected or involved

We understand that anyone affected by, or involved with, a complaint of harassment, bullying or

victimisation may feel anxious or upset and we will do what we can to support you.

- **Experiencing** harassment or bullying can have a profound emotional, psychological and physical effect on an individual. If you feel you cannot continue to work in close contact with the person concerned, we will seriously consider any requested changes to your working arrangements during our investigation.
- Being **accused of** harassment or bullying can also be distressing for an individual and may cause challenges in their personal and professional life. The Company is committed to conducting a thorough and fair investigation, and individuals complained about will be treated with respect and dignity throughout the process.
- **Witnessing** an incident can be upsetting and distressing and it takes courage to report and/or challenge behaviour. It is important for the individual to remember to care for their own health and get support where needed.

Whether you have experienced harassment or bullying, or been accused of it, or witnessed inappropriate behaviour, we encourage you to reach out for support using the resources available to you.

- **Internal resources** for employees and managers include the following:
  - Employee Assistance Programme
  - Wisdom Wellbeing App
  - Mental Health First Aiders
  - AXA Health Insurance (for members)
- **External Support –** There are a number of independent organisations that can provide confidential advice and support to individuals who have experienced, witnessed or been accused of harassment, bullying or victimisation:
  - Advisory, Conciliation and Arbitration Service (ACAS) (www.acas.org.uk)
  - Protect (www.protect-advice.org.uk)
  - Victim Support (www.victimsupport.org.uk)
  - Equality Advisory and Support Service (www.equalityadvisoryservice.com)
  - Samaritans (www.samaritans.org)

  Employees may also wish to seek support from their GP or other professional support services.

Employees that raise concerns, report they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

If you believe you have suffered any such treatment you should inform your line manager or the HR Team without delay. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Consequences of breaching this policy

If, following a formal investigation, we find that you have committed, authorised or condoned an act of harassment, bullying or victimisation, or where you had a responsibility to act, you failed to respond appropriately to harassment, bullying or victimisation of which you were aware, we will deal with the issue as a possible case of misconduct or gross misconduct.

We may take disciplinary action against you, up to and including dismissal, or other appropriate action for non-employees. You should be aware that any aggravating factors, such as abuse of power over a more junior colleague, targeting an agency worker, retaliating against someone who raised concerns, or repeated behaviour after warnings or training, will be taken into account in deciding what action to

take.

Sensitivity and confidentiality

Anyone involved with an informal or formal complaint about harassment, bullying or victimisation, including witnesses, is expected to maintain confidentiality of the process and the sensitivity of the matter. Information should not be shared with others unless reasonably necessary, for example to obtain advice, support or representation.

If you are found to have breached confidentiality or acted without due care or sensitivity in a case of this nature, we may take disciplinary action against you up to and including dismissal, or other appropriate action for non-employees.

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

Record-keeping

Information about a complaint by, or about an employee may be placed on their personnel file, along with a record of the outcome and any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

We may also retain anonymised or aggregated information for monitoring purposes to identify trends, hotspots, repeat concerns, training needs and the effectiveness of preventative measures.

Training & Communication

We aim to take reasonable and proactive steps to prevent harassment, bullying and victimisation of our employees during the course of their employment through:

- Ensuring all new starters, including agency workers where appropriate, are made aware of and have access to this policy.
- Ensuring all employees complete harassment, bullying and respectful workplace training at appropriate intervals.
- Providing additional training for line managers to ensure that they understand how to implement this policy effectively and their role in preventing, identifying and responding to concerns.
- Providing additional guidance and training for higher-risk parts of the business, including depots, yards, workshops, customer-facing roles, lone working, and overnight travel.
- Making clear that this policy applies equally to in-person behaviour and to digital communications including WhatsApp, Microsoft Teams and other communication platforms used for work purposes.
- Publicising and communicating this policy using various methods including the intranet, notice boards, Employee Handbook, Company-wide emails, toolbox talks and The Academy.
- Monitoring workplace culture through anonymous surveys, exit interviews, one-to-one conversations, return-to-work meetings and other available information to identify and address issues.
- Undertaking risk assessments to determine reasonable and proportionate measures that can be implemented to minimise the risk of harassment, bullying and victimisation in the workplace.
- Ensuring that our zero-tolerance approach to harassment, discrimination, bullying and victimisation is communicated to all employees and, where appropriate, to third parties.

Monitoring and review

This policy is reviewed annually and, if necessary, amended to ensure that it remains effective. We will analyse data around allegations of harassment, bullying and victimisation, in compliance with our data protection obligations, on an ongoing basis to assess the impact of this policy.

This includes monitoring the treatment and outcomes of complaints to ensure that:

- they are properly investigated and resolved
- those who report or act as witnesses are not victimised
- repeat offenders are dealt with appropriately
- cultural clashes and areas of heightened risk are identified and addressed
- workforce training is targeted where needed
- preventative measures remain effective and proportionate.