

DIGNITY AT WORK POLICY

INTRODUCTION

Harassment, victimisation or bullying – whether on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the **protected characteristics** as defined by the Equality Act 2010) or for any other reason, is unacceptable behaviour that the Company will not tolerate.

Every employee of Integral has the right to be treated with dignity and respect. Appropriate disciplinary action, up to and including dismissal, will be taken against any employee, of whatever seniority, who contravenes this policy.

The Company will not tolerate victimisation of any employee involved in the bringing of a complaint of harassment or bullying under the Company's procedure. Such victimisation will itself constitute a disciplinary offence, which may in appropriate circumstances lead to dismissal.

This policy covers behaviour which occurs in the workplace or which is directly connected to a person's employment.

Harassment and bullying does not include appropriately conducted fair criticism of an employee's conduct or job performance by management.

Senior management of Integral is fully committed to this policy.

This policy does not confer any contractual rights on individual employees. The company reserves the right to alter any of its terms and conditions although you will be notified in writing of any changes.

DEFINITIONS

Harassment is defined as '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 or humiliating or offensive environment for that individual'.

Harassment can take many forms. Examples of harassment include:

- Bullying
- Seeking sexual favours
- Threatened or actual assault
- Less favourable treatment of an employee who refuses sexual advances
- Pestering an older worker to retire
- Overloading someone with unreasonable work tasks related to a protected characteristic
- Using abusing or insulting language
- Displaying offence pictures
- Extreme jokes
- Physical assaults

This is not an exhaustive nor inclusive list. Some forms of harassment plainly constitute gross misconduct for the purposes of the Company's Discipline at Work Procedure (PER 070) and will normally merit summary dismissal.

In addition, the individual committing the act of harassment may also be held personally liable under the Protection from Harassment Act 1997 punishable by up to six months imprisonment or a fine of up to £5,000.

Third Party Harassment occurs where an employee is harassed by third parties such as clients or customers. Integral will not tolerate such actions against its employees and the employee concerned should inform their Line Manager at once if this occurs. Integral will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

Bullying is persistent behaviour directed against an individual or group of individuals not based on a protected characteristic which makes the recipient/s feel threatened, humiliated or vulnerable and which undermines their self-confidence. Bullying can take many forms. Examples prohibited by this policy include:

- verbal abuse, such as shouting or swearing at colleagues;
- threatening or insulting colleagues;
- abusing power or using unfair penal sanctions;
- practical jokes, initiation ceremonies or inappropriate birthday rituals;
- physical abuse such as hitting, pushing or jostling;
- rifling through, hiding or damaging personal property;
- ostracising or excluding colleagues from work events or social activities.

This is not an exhaustive nor inclusive list.

Victimisation is defined as 'Treating someone badly because they have done a 'protected act' (or because you believe that a person has done or is going to do a protected act). A 'protected act' is:

- Making a claim or complaint of discrimination (under the Equality Act).
- Helping someone else to make a claim by giving evidence or information.
- Making an allegation that you or someone else has breached the Act.
- Doing anything else in connection with the Act.

WHEN CAN BULLYING, HARASSMENT OR VICTIMISATION OCCUR?

An employee can be bullied, harassed or victimised by another colleague or subordinate as well as by a manager or supervisor; by an individual acting alone; or a group of individuals. An employee can be bullied or harassed at work and also, through his or her connection with work, outside working hours and/or outside the workplace. The Company will not tolerate bullying, harassment or victimisation whatever the perpetrator's status, and wherever it occurs.

It is important to recognise that certain behaviour or actions may be acceptable to one individual while unacceptable to another. It is the deed and the impact on the recipient which constitutes harassment. All employees must treat their colleagues with respect and appropriate sensitivity.



RESPONSIBILITY OF EMPLOYEES, SUPERVISORS AND MANAGERS

It is the responsibility of all employees to comply with this policy and the particular responsibility of supervisors and managers to ensure it is carried out, with a view to developing and maintaining a working environment at Integral in which harassment and bullying are understood by all to be unacceptable. To this end, all employees will be made aware of this Policy and will be expected to familiarise themselves with it and abide by its provisions. The Policy does not, however, confer any contractual rights.

It is expected that all employees will act responsibly regarding this issue. False accusations of harassment or bullying can have a serious effect on innocent individuals. Therefore, should investigation show that a false accusation has been made in bad faith, appropriate disciplinary action, up to and including dismissal, will follow. However, an employee who brings a complaint in good faith will not be subjected to any detriment by Integral.

COMPLAINTS PROCEDURE

The Company recognises the right of employees to determine for themselves whether the words or behaviour of others is acceptable to them and to bring a complaint in respect of harassment, bullying or victimisation. Following the investigation of a complaint, the decision as to whether the complaint is warranted and, if so, what disciplinary sanction should apply is the responsibility of management.

Any complaint will be handled by the Company sensitively, in a timely and confidential manner. This is a specific procedure to deal with harassment or bullying complaints. Any such complaint should be raised under this procedure initially using the Informal Complaint Procedure (as detailed below). However it is recognised that this is not always appropriate and in such situations employees should use Formal Complaint Procedure (as detailed below).

Any records made of any action taken under this procedure will be treated as confidential wherever possible.

This procedure only applies whilst you are employed by the Company.

In order to gain a speedy resolution to a complaint, employees can raise such a complaint via the routes of either:

- **Informal Complaints Procedure**
- **Formal Complaints Procedure**



INFORMAL COMPLAINTS PROCEDURE

If you consider yourself to be the victim of harassment, bullying or victimisation, you may in some cases be able to resolve the matter satisfactorily by explaining clearly to the perpetrator(s) that their behaviour is unacceptable, contrary to the Company's policy and must stop. Alternatively you may wish to ask a fellow employee to put this on your behalf or to be with you when meeting with the perpetrator(s).

You are encouraged to seek the assistance of your Line Manager or HR Department when you want advice regarding appropriate steps to stop the harassment, bullying or victimisation. Any such discussion will be strictly confidential.

If it is considered to be appropriate, your Line Manager or HR Department may seek to resolve the matter informally by indicating to the alleged perpetrator(s), without prejudging the matter, that there has been a complaint that their behaviour is having an adverse effect on a fellow employee; that any such behaviour is contrary to Company policy; that the continuation of such behaviour would, if substantiated, amount to a serious disciplinary offence.

If a complaint is resolved informally, the alleged perpetrator(s) will not be subject to disciplinary sanctions. However, in exceptional circumstances and following consultation with you, the Company may decide that, notwithstanding that you raised the matter informally it is necessary to investigate further and take more formal action.

FORMAL COMPLAINTS PROCEDURE

In the event that informal resolution of the matter is unsuccessful or considered inappropriate in the circumstances, you may make a formal written complaint about the harassment or bullying to your line manager using the Grievance Procedure (PER 071) to bring your complaint. In addition, the Company may decide that it is necessary to take more formal action (see above). A formal complaint may lead ultimately to the imposition of disciplinary sanctions on the perpetrator(s). Where the complaint relates to your Line Manager you may, if you so wish, raise the complaint with the next higher level of management or if not appropriate please refer to the HR Department.

You must provide the following details in your formal written complaint: name of the alleged perpetrator(s), nature of the harassment or bullying, dates and times the harassment or bullying occurred, names of witnesses and any action taken by you to attempt to resolve the matter informally.

Where you and the alleged perpetrator(s) work in proximity to each other, it may be necessary to ensure you do not continue to do so whilst the complaint is being investigated and during any consequent disciplinary proceedings. This may necessitate, in extreme cases, that one or both parties be suspended on full pay. Suspension on full pay does not amount to a disciplinary sanction.

Any complaint will be investigated promptly, impartially and, so far as practicable, confidentially. This will be achieved by Integral inviting you to a meeting to consider the details of the allegation. All meetings shall be in accordance with the Grievance Procedure (PER 071) which also explains your rights. If you are unclear, please speak to a member of the HR Team or your Line Manager.

Where the evidence gathered in the investigation and during the meeting indicates to the Company that a disciplinary offence has been committed, the Company's Discipline at Work Procedure (PER 070) will be instigated and a disciplinary hearing under that procedure will be arranged to deal with the alleged disciplinary offence. In accordance with that procedure, the alleged perpetrator(s) will be provided with relevant evidence about the allegations against them and will be given a full opportunity to respond.

Where the investigation indicates that no disciplinary offence has been committed, both you and the alleged perpetrator(s) will be informed in writing.