

Dignity at Work / Anti-harassment Policy

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Corporate Fit	Internal Management Plan	✓
	Risk Register	✓
	Business Plan	✓
	Equalities Strategy	✓
	Legislation	✓

Keep in touch

868 Tollcross Road | G32 8PF
0141 763 1317
info@tollcross-ha.org.uk
www.tollcross-ha.org.uk

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Our policies provide a framework to underpin our vision and values, to help us achieve our strategic objectives.

Our Vision

Local people, local control.

By providing quality homes and services, we will create stronger communities and a better quality of life for our customers.

Our Values

- Focused on the needs of our customers and communities.
- Supportive of our staff and Committee members.
- Responsible, efficient, and innovative.
- Open and accountable.
- Inclusive and respectful.
- Fair and trustworthy.

Strategic Direction

Consolidation and improvement: Applicable to our core business as a landlord & property manager.

Growth: Through the new build opportunities, we are taking forward.

Partnerships: Where this can help to address shared goals and increase capacity and value.

Resilience: A key priority across all parts of our business.

Strategic Objectives

Services: Deliver quality, value for money services that meet customers' needs

Homes & neighbourhoods: Provide quality homes and neighbourhoods.

Assets: Manage our assets well, by spending wisely.

Communities: Work with local partners to provide or enable services and activities that benefit local people and our communities as a whole

Our people: Offer a great workplace environment that produces a positive staff culture and highly engaged staff.

Leadership & Financial: Maintain good governance and a strong financial business plan, to ensure we have the capacity to achieve our goals.

Our Equalities and Human Rights Commitment

We understand that people perform better when they can be themselves and we are committed to making the Association an environment where employees, customers, and stakeholders can be open and supported. We promote equality, diversity, and inclusion in all our policies and procedures to ensure that everyone is treated equally and that they are treated fairly on in relation to the protected characteristics as outlined in the Equality Act 2010.

Privacy Statement

As data controller we will collect and process personal data relating to you. We will only collect personal information when we need this. The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it. We will also make it clear when you do not have to provide us with information and any consequences of not providing this. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. Further information about this commitment can be found within our full Privacy Statements.

Policy Scope & Review

For the purpose of this policy the term Association will include all members of the Tollcross Housing Association Limited. Therefore, all employees, governing body members, volunteers, customers and other relevant stakeholders will be expected to adhere to this policy and/or procedure. All policies and procedures are reviewed every 3 years in line with best practice and current legislation. The Association reserves the right to make additions or alterations to this policy and procedure from time to time. Any timescales set out in this policy may be extended where required.

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1. Introduction

- 1.1. We are committed to providing a working environment which is free from harassment, bullying and intimidation of any nature. Every employee, worker, volunteer, and stakeholder must treat all colleagues with dignity and respect, regardless of any personal characteristic.
- 1.2. The terms bullying and harassment will be used throughout this policy to mean dignity at work. However, in general terms we wish to ensure that any incident or behaviour which is deemed unacceptable by the recipient is covered whether explicitly stated within the definitions contained within various sections of this policy or not.

2. Purpose & scope

- 2.1. Given the often complex and sensitive issues which are associated with bullying and harassment simply adhering to this policy will not ensure that the outcome will be perceived to be successful by all who are involved. However, by using this policy, we aim to be able to satisfy those involved by ensuring that best practice principles are followed.
- 2.2. The policy covers bullying and harassment of, among and by staff. It is recognised that when dealing with external stakeholders there are difficulties when managing these relationships when bullying and harassment is involved. However, we have a commitment to deal with these issues when they arise and we will communicate with our stakeholders when they do. Appendix 2 identifies the procedure for bullying and harassment from other stakeholders or 3rd parties external to the Association.

3. Definitions

- 3.1. Bullying and harassment take many forms, occur for a variety of reasons and may be directed at individuals or groups. Due to the fact that bullying and harassment is often misunderstood, badly misinterpreted and largely unrecognised in the workplace, it is necessary to have written definitions to appreciate the nature of the behaviour. Not only is bullying a serious moral issue, but it has strong implications for business performance. Peak levels of motivation are achieved in a culture defined by respect and recognition, not humiliation and intimidation.
- 3.2. Bullying
 - Bullying may be characterised as, offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.
 - Bullying is often persistent unwelcome behaviour, mostly using unwarranted or invalid criticism, nit-picking, fault-finding, also exclusion, isolation, being singled out and treated differently, being shouted at, humiliated, excessive monitoring, and much more.
 - Bullying is an inefficient and unacceptable way of working, resulting in disenchantment, demoralisation, demotivation, disaffection and alienation. Bullies run dysfunctional and inefficient organisations; staff turnover and sickness absence are high, whilst morale and productivity are low.
- 3.3. Harassment
 - Harassment as defined in the Equality Act 2010 is, unwanted conduct related to a relevant protected characteristic (see appendix 3 for more information on the protected characteristics), 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.

- Harassment can occur where someone perceives another person to have a protected characteristic. Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic.

3.4. Victimisation

- Victimisation means suffering a detriment because you've done or intend to do a protected act. A protected act means taking action related to discrimination law. This includes, making a complaint of discrimination or harassment, supporting someone else's complaint, gathering information that might lead to a complaint, acting as a witness in a complaint, or saying something or giving evidence that does not support someone else's complaint.
- The law also protects a person from victimisation when someone else thinks the person has done or intends to do any of the things above.

3.5. Sexual harassment

Under the Equality Act 2010, sexual harassment is recognised as a free-standing form of discrimination and is defined as when a person engages in unwanted behaviour of a sexual nature, whether verbal, non-verbal or physical, that creates an intimidating, hostile, degrading, humiliating or offensive working environment. More information about sexual harassment can be found in appendix 4.

3.6. Examples of bully, harassing and unacceptable behaviours can be found in appendix 5.

4. **Our commitment**

4.1. We view bullying and harassment as serious or gross misconduct, which will be subject to action under the disciplinary policy and procedure. In serious cases, dismissal can be an outcome.

4.2. We intend to eliminate bullying and harassment from the workplace by:

- Promoting a climate in which employees feel valued and sufficiently supported in bringing forward complaints without fear of victimisation or recrimination.
- Raising the awareness for all employees of the stance taken against all forms of bullying and harassment by the Association and their own responsibilities for preventing such behaviour.
- Promoting awareness amongst staff of the reasonableness or otherwise of what may or may not be acceptable behaviour to colleagues and the standards of behaviour expected by the Association and the impact which unacceptable behaviour can have on colleagues.
- Outlining the procedures for dealing with bullying and harassment ensuring that the matter is dealt with promptly and sensitively and takes into account the rights of both parties involved.
- Providing access to confidential counselling, advice and support for victims of bullying and harassment at work.

4.3. In addition, to intentionally harass, alarm, or distress anyone can be a criminal offence, and this policy does not deny or inhibit in anyway whatsoever the Association, or the

employee's legal rights, responsibilities, obligations and remedies. In serious cases dismissal and criminal prosecution can result.

- 4.4. We will not discriminate against customers or employees on the basis of their gender, sexual orientation (including gay lesbian, bisexual and transgender), marital or civil partner status, gender reassignment, race including nationality, ethnic or national origin, disability, age or pregnancy or the fact that an individual is a part time worker or a fixed term employee. Staff or applicants for employment with the Association shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes.
- 4.5. We have a zero-tolerance approach to bullying and harassment. We will at all times endeavour to work within legislative requirements as well as promoting best practice in challenging incidents of bullying and harassment due to sexual orientation/gender identity, race, nationality or ethnicity, religion or disability.

5. Responsibilities

- 5.1. We have responsibilities to ensure our employees have a safe work environment, including being free from bullying and harassment. We have a specific legal duty to ensure the workplace is protected from threats of sexual harassment. This preventative duty treats sexual harassment as a hazard, and we have carried out an organisational risk assessment to help remove or reduce this potential hazard. The risk assessment can be found in appendix 6.
- 5.2. Everyone has a responsibility for their own behaviour and to ensure that their actions, attitudes or behaviours do not cause distress or upset to colleagues or any other person with whom they come into contact with during the course of their work.
- 5.3. Everyone must:
- Adhere to the positive competencies and behaviours identified by the Association.
 - Maintain a working environment free from discrimination or harassment.
 - Maintain a working environment in which the dignity of all individuals is respected.
 - Report incidents of bullying / harassment they experience to the relevant manager as soon as they occur.
 - Report incidents of any bullying /harassment they witness to the relevant manager as soon as they occur.
- 5.4. Line managers have a specific responsibility to be vigilant in respect of the identification and elimination of bullying or harassment at work and to ensure implementation of, and adherence to, this policy.
- 5.5. Line managers are responsible for ensuring that staff, who report to them perform to an acceptable standard of work performance. Legitimate, justifiable, appropriately conducted monitoring of an employee's behaviour or job performance does not, therefore, constitute bullying.
- 5.6. It is reasonable to expect a manager to carry out these functions in a fair, firm and consistent manner. Carrying out these functions does not constitute an act of bullying or harassment, although some staff may feel stressed or anxious while the procedures are ongoing. However, abusing these procedures may constitute bullying or harassing behaviour.

- 5.7. It is important to differentiate between management and bullying or harassing behaviour. It is in the interests of the organisation that managers should be able to carry out their duties without threat of ill-intentioned, malicious or vexatious complaints.
- 5.8. Differences in perception, can sometimes make it difficult to differentiate between firm, fair management and bullying and harassment. Below are some suggested extremes of these behaviours in practice.

Firm/Fair Manager

- Consistent and fair.
- Leads by example.
- Decisive.
- Has a good appreciation of short, medium and long term needs, goals and strategy.
- Learns from experience and applies knowledge gained from experience to improve business, communication and interpersonal skills.
- Allows and trusts people to get on with the job.
- Share information freely.
- Only addresses genuine performance issues then focuses on performance and behaviour.
- Listens, guides, instructs.
- Acknowledges failings.

Bullying/Harassing Manager

- Aggressive, inconsistent and unfair.
- Dominates, sets a poor example.
- Random, impulsive.
- Is rigidly short-term, often no more than 24 hours.
- Cannot apply knowledge gained from experience except by being devious, manipulative and how to better evade accountability.
- Constantly interfering, dictating and controlling.
- Withholds information, releases selectively.
- Makes false claims about alleged underperformance and focuses on the person, not behaviour or performance.
- Tells.
- Denies failings, always blames others.

6. Informal process

- 6.1. Due to the complex nature of complaints, we have a flexible approach to ensure employees feel comfortable raising concerns. We want to remove barriers to stepping forward and ensure all employees are heard.
- 6.2. In the first instance, an employee should raise concerns with their line manager. Where they feel unable to do this, due to the nature of the concerns, they can either escalate to their director or speak to a member of the Corporate Services team.
- 6.3. The suitable manager/director should meet with the employee and attempt to identify the nature and cause of the problem, possible courses of action or responses and their implications.
- 6.4. The informal stage encourages employees to engage with the person to help resolve the matter, ensuring that both parties are involved in agreeing a positive way forward. In these circumstances, mediation or conciliation meetings can be used to facilitate the discussion between the employees. A note of the agreement made between the parties will be held on file
- 6.5. Where an employee feels that the informal process has not adequately dealt with the matter, or they are uncomfortable with meeting with the person, they may choose to escalate to the formal process.

7. Formal process

- 7.1. In some cases, the initial concern raised will be escalated to the formal stage due to the serious natures of the complaint. An employee may also choose the formal process where they do not want to engage at an informal stage.
- 7.2. The formal stage requires an employee to put their concerns in writing. In the first instance, an employee should raise concerns with their line manager. Where they feel unable to do this, due to the nature of the concerns, they can either escalate to their director or speak to a member of the Corporate Services team.
- 7.3. Due to the potential outcome of a complaint being disciplinary action, the suitable manager/director will carry out an investigation in line with the Association's disciplinary policy. However, the focus should remain on resolution of the complaint between both parties.
- 7.4. Where the complaint relates to a senior employee, we may seek external consultants to carry out the formal process to ensure a fair and transparent process.

8. Support

- 8.1. We recognise that allegations of this nature can be difficult for both parties, as such we encourage them to take advantage of the Association's employee assistance programme.

9. Malicious Allegations

- 9.1. Any person found to be making fictitious or malicious allegations will be dealt with through the Association's disciplinary policy which may result in dismissal.

Appendix 1 – Equality & Human Rights Impact Assessment

Policy	Dignity at Work		
EIA Completed by	Corporate Manager	EIA Date	Dec 2024
1. Aims, objectives, and purpose of the policy / proposal			
The aim of the policy is to reinforce the Association’s commitment to a workplace free from bullying and harassment, and where issues do arise the policy provide a supportive framework to deal with these matters.			
2. Who is intended to benefit from the policy / proposal?			
All employees.			
3. What outcomes are wanted from this policy / proposal?			
An increased awareness in acceptable workplace behaviours and understanding of how to raise concerns when they arise.			
4. Which protected characteristics could be affected by proposal?	<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Gender reassignment	<input checked="" type="checkbox"/> Religion or belief
	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Marriage & civil partnership	<input checked="" type="checkbox"/> Sex
	<input checked="" type="checkbox"/> Race	<input checked="" type="checkbox"/> Pregnancy and maternity	<input checked="" type="checkbox"/> Sexual orientation
5. If the policy / proposal is not relevant to any of the protected characteristics listed in part 4, state why and end the process here.			
6. Describe the likely impact(s) the policy / proposal could have on the groups identified in part 4			
The policy directly links to the protected characteristics in the workplace. The policy is to reinforce the Association’s commitment to a fair workplace for all, free from bullying harassment. The policy details specific examples of bully and harassment of protected characteristics to make it clear what is not tolerated.			
7. What actions are required to address the impacts arising from this assessment? (This might include; collecting data, putting monitoring in place, specific actions to mitigate negative impacts).			
The policy is to ensure fair workplace for all. Therefore, the impact is meant to have a positive impact on those with a protected characteristic.			

Appendix 2 – Managing dignity at work issues from external stakeholders

Employees have the same rights as customers and stakeholders to be treated with respect and dignity at all times and have the right to complain if bullied or harassed by members of the public, Management Committee members or contractors or staff from other agencies.

If an employee is bullied or harassed in the course of carrying out their duties, by an external stakeholder, the following procedure should be adopted. It is a priority of the Association to ensure that no employees are put in a situation of potential risk and the following procedures are put in place to protect staff whilst carrying out their duties.

Stage 1

If the employee feels able to do so they should inform the bully or harasser, at the time, if possible, that they find their actions/remarks and behaviour to be unacceptable. They should state that they wish the unwanted behaviours to stop. If the situation warrants the need for a witness employees are advised to approach a colleague to accompany them when approaching the alleged bully or harasser. The employee should then report the matter to their manager as soon as possible.

If the employee does not feel able to speak to the bully or harasser personally, they can ask their manager to do this on their behalf.

It will be the responsibility of the manager involved to discuss the action taken to date and what should be done in the future if any further incidents occur. The manager should also liaise with relevant senior managers linked to the stakeholder.

The manager must inform the harasser of the consequences of further incidents, for example escalation through our Unacceptable Actions Policy.

If informal action proves insufficient to deal with persistent acts of bullying and harassment, then management reserves the right to take further formal action (in serious cases it may be appropriate to move directly to this stage).

Stage 2 – Unacceptable Actions Policy

Where an incident is escalated or a serious incident, it will be dealt with in line with the Association's Unacceptable Actions Policy.

Additional guidance for contractors or partnership organisations

If the harasser is a contractor or staff member from another agency, the manager will contact the appropriate senior person within the organisation concerned to advise them that this type of behaviour is unacceptable and that if it is repeated then the individual concerned may be refused entry to the Association's premises.

Should the matter not be resolved informally, stage 2 would require the appropriate senior manager to write to the appropriate senior person within the organisation concerned to advise them that this type of behaviour is unacceptable and that if it is repeated then the individual concerned may be refused entry to the Association's premises or continued contact with staff of the Association.

Appendix 3 – Equality Act 2010 Extract – Protected Characteristics

The Equality Act 2010 gives protection against discrimination harassment and victimisation because of the following protected characteristics.

Age

(1) In relation to the protected characteristic of age; (a) a reference to a person who has a particular protected characteristic is a reference to a person of a particular age group; (b) a reference to persons who share a protected characteristic is a reference to persons of the same age group.

(2) A reference to an age group is a reference to a group of persons defined by reference to age, whether by reference to a particular age or to a range of ages.

Disability

(1) A person (P) has a disability if; (a) P has a physical or mental impairment, and (b) the impairment has a substantial and long-term adverse effect on P's ability to carry out normal day-to-day activities.

(2) A reference to a disabled person is a reference to a person who has a disability.

(3) In relation to the protected characteristic of disability; (a) a reference to a person who has a particular protected characteristic is a reference to a person who has a particular disability; (b) a reference to persons who share a protected characteristic is a reference to persons who have the same disability.

(4) This Act applies in relation to a person who has had a disability as it applies in relation to a person who has the disability; accordingly; (a) a reference (however expressed) to a person who has a disability includes a reference to a person who has had the disability, and (b) a reference (however expressed) to a person who does not have a disability includes a reference to a person who has not had the disability.

Gender reassignment

(1) A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.

(2) A reference to a transsexual person is a reference to a person who has the protected characteristic of gender reassignment.

(3) In relation to the protected characteristic of gender reassignment; (a) a reference to a person who has a particular protected characteristic is a reference to a transsexual person; (b) a reference to persons who share a protected characteristic is a reference to transsexual persons.

Marriage and civil partnership

(1) A person has the protected characteristic of marriage and civil partnership if the person is married or is a civil partner.

(2) In relation to the protected characteristic of marriage and civil partnership; (a) a reference to a person who has a particular protected characteristic is a reference to a person who is married or is a civil partner; (b) a reference to persons who share a protected characteristic is a reference to persons who are married or are civil partners.

Race

(1) Race includes; (a) colour; (b) nationality; (c) ethnic or national origins.

(2) In relation to the protected characteristic of race; (a) a reference to a person who has a particular protected characteristic is a reference to a person of a particular racial group; (b) a reference to persons who share a protected characteristic is a reference to persons of the same racial group.

(3) A racial group is a group of persons defined by reference to race; and a reference to a person's racial group is a reference to a racial group into which the person falls.

(4) The fact that a racial group comprises two or more distinct racial groups does not prevent it from constituting a particular racial group.

(5) A Minister of the Crown may by order; (a) amend this section so as to provide for caste to be an aspect of race; (b) amend this Act so as to provide for an exception to a provision of this Act to apply, or not to apply, to caste or to apply, or not to apply, to caste in specified circumstances.

Religion or belief

(1) Religion means any religion and a reference to religion includes a reference to a lack of religion.

(2) Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief.

(3) In relation to the protected characteristic of religion or belief; (a) a reference to a person who has a particular protected characteristic is a reference to a person of a particular religion or belief; (b) a reference to persons who share a protected characteristic is a reference to persons who are of the same religion or belief.

Sex

In relation to the protected characteristic of sex; (a) a reference to a person who has a particular protected characteristic is a reference to a man or to a woman; (b) a reference to persons who share a protected characteristic is a reference to persons of the same sex.

Sexual orientation

(1) Sexual orientation means a person's sexual orientation towards; (a) persons of the same sex, (b) persons of the opposite sex, or (c) persons of either sex.

(2) In relation to the protected characteristic of sexual orientation; (a) a reference to a person who has a particular protected characteristic is a reference to a person who is of a particular sexual orientation; (b) a reference to persons who share a protected characteristic is a reference to persons who are of the same sexual orientation.

Appendix 4 – Sexual Harassment Information

The Equality Act 2010 defines sexual harassment as ‘conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment’. Sexual Harassment is unlawful under the Equality Act 2010. It is also unlawful to treat someone less favourably because they have submitted a complaint of sexual harassment or have rejected such a behaviour.

Sexual harassment includes a wide range of behaviours including but not limited to: (1) Making sexual remarks about a colleague's body, clothing or appearance, (2) Suggestive looks, staring, or leering, (3) Propositions and sexual advances, (4) Sexual gestures, (5) Emailing, texting or messaging sexual content, (6) Unwelcome touching, hugging, massaging or kissing, (7) Sexual comments or offensive jokes, (8) Making sexual comments or jokes about someone's sexual orientation or gender reassignment, (9) Displaying or sharing sexually graphic images, or other sexual content, and (10) Criminal behaviour, including sexual assault, stalking, grooming, indecent exposure and sending offensive communications.

Sexual harassment can be a singular event or something that is an ongoing pattern of behaviour. Sexual harassment may be physical, verbal or non-verbal conduct. It can occur face to face or can be done by email, phone calls, online and on social media. Sexual harassment may occur at work or outside work.

Sexual conduct that has been welcomed previously can become unwanted, the person in receipt of the behaviour decides whether it is unwanted. An individual can experience sexual harassment from someone of the same or different sex.

Sexual interactions that are invited, mutual and consensual are not considered as sexual harassment.

Potential impact

Younger female employees are at a higher risk of experiencing sexual harassment in the workplace. Disabled people are twice as likely as non-disabled people to experience unwanted touching. Statistics show that more women have experienced sexual harassment however men also experience sexual harassment. BAME people often experience sexual harassment that is racialised. LGBTI people are more likely than straight people to receive unwelcome comments about their sex life.

Behaviour expectations

We expect you to follow the expectations as set out within the Code of Conduct, job descriptions and other standards. Any sexual harassment by employees towards others in connection with work will be considered under the Disciplinary/Grievance policy and action taken under this policy can include up to and including dismissal. Sexual harassment may constitute gross misconduct and may result in dismissal.

Preventative Duties

The Worker Protection Act (Amendment Equality Act 2010) requires employers to take reasonable steps to prevent sexual harassment. We have carried out a risk assessment in consultation with all employees (appendix 6) to identify any potential risks of sexual harassment they may be impacted by. The risk assessment also identifies further information about what actions we have taken in this area.

Witness to unwanted conduct of sexual nature

Tackling sexual harassment is everybody's responsibility. You do not have to be the recipient or target of sexual harassment to raise a concern or make a complaint. If you see it happening or become aware of it, you should report it to your line manager or appropriate director as soon as possible.

Appendix 5 – Examples of bully / harassing behaviours (this is not an exhaustive list)

General / All	<ul style="list-style-type: none"> ▪ Spreading malicious rumours, or insulting someone by word or behaviour. ▪ Exclusion or victimisation. ▪ Unfair treatment. ▪ Overbearing supervision or other misuse of power or position. ▪ Making threats or comments about job security without foundation. ▪ Deliberately undermining by overloading and constant criticism. ▪ Preventing individuals progressing by intentionally blocking promotion or training opportunities. ▪ Sending/forwarding inappropriate electronic content (whether intentionally offensive or not)
Age	<ul style="list-style-type: none"> ▪ Ridiculing or demanding behaviour focused on people because of their age.
Disability	<ul style="list-style-type: none"> ▪ Mimicking the effect of a disability or speech impairment. ▪ Ostracising, "freezing out", ignoring and staring. ▪ Use of inappropriate terms (eg cripple, spastic). ▪ Inappropriate personal questions/comments about a disability. ▪ Belittling or patronising comments/nicknames. ▪ Moving a wheelchair or aid without the user's agreement. ▪ Practical jokes (eg hiding a disability aid). ▪ Touching a visibly impaired person (to annoy).
Sexual	<ul style="list-style-type: none"> ▪ Unwanted non-accidental physical contact ranging from unnecessary touching, patting, pinching or brushing against a colleague's body. ▪ Unwelcome sexual advances, propositions or pressure for sexual activity: continued suggestions for social activity within or outside the workplace, after it has been made clear that such suggestions are unwelcome: offensive flirting. ▪ Suggestions that sexual favours may further a colleague's career, or refusal may hinder it e.g. promotions, salary increases etc. ▪ The display of pornographic or sexually suggestive pictures or written materials. ▪ Leering, whistling or making sexually suggestive comments or gestures, innuendoes or lewd comments. ▪ Conduct that denigrates or ridicules or is intimidatory or physically abusive of an employee because of their sex, such as derogatory or degrading abuse or insults which are gender-related and offensive comments about appearance or dress.
Racial	<ul style="list-style-type: none"> ▪ Conduct that denigrates or ridicules a colleague because of their race, such as derogatory remarks, graffiti, jokes. Such conduct can be verbal or physical. ▪ The display or sending of offensive letters or publications: threatening behaviour. ▪ Being "frozen out" of conversations: jostling or assault, or other non accidental physical contact. ▪ Derogatory nicknames or racial name calling.
Religious	<ul style="list-style-type: none"> ▪ Discriminatory behaviour which fails to acknowledge the rights or needs of people with different beliefs or practices.
Aids/HIV	<ul style="list-style-type: none"> ▪ Harassment, ridicule or exclusion of people, due to their real or suspected infection with Aids/HIV.
LGBTi	<ul style="list-style-type: none"> ▪ 'outing' someone as LGBTi. ▪ Use of inappropriate terms, inappropriate personal questions/comments. ▪ Being targeted because of who you are or who you are perceived to be. ▪ homophobic or derogatory language.
Gender / Non-binary / trans	<ul style="list-style-type: none"> ▪ transphobic bullying can happen when someone does not fit neatly into binary gender understandings. ▪ gender or sexuality-based aggression as joking ▪ 'dead naming' someone who has transitioned

Appendix 6 – Sexual Harassment Risk Assessment & Action Plan (Update December 2024)

	Potential Hazard & Potential Harm	Existing Controls	Further Action Required	Outcome
1)	<p>Lone working.</p> <ul style="list-style-type: none"> - In office - Outside office <p>Employees may face increased risks of sexual harassment due to limited supervision or support.</p>	<p><u>In office</u> – panic alarm in place to alert colleagues to situation at reception area and interview rooms. CCTV in place. Interview room 1 designed with higher desk for increase personal safety.</p> <p><u>Outside office</u> – employees equipped with mobile phones / personal alarms. No lone visit flag in place for properties of increased risk.</p>	<p><u>In office</u> – explore options for a silent alarm (for situations where support is required but it hasn't escalated to a panic alarm stage).</p> <p><u>Outside office</u> – explore options for a lone working app on mobile phones for increased security.</p> <p><u>Outside office</u> – review no lone visit process (to increase clarity for employees reporting incidents).</p>	
2)	<p>Customer facing duties.</p> <p>Employees may be more vulnerable to sexual harassment due to a higher frequency of interactions.</p>	<p>Zero tolerance notices in reception / interview rooms / website.</p> <p>Unacceptable Actions policy in place.</p>	<p>Standard statement to be added to newsletter.</p> <p>Standard statement to be shared with employees to allow for them to remove themselves from an unacceptable situation (and feel support by Association).</p> <p>Review unacceptable action policy to ensure reference made to sexual harassment.</p>	
3)	<p>Work with contractors.</p> <p>Employees may be more vulnerable to sexual harassment due to the nature of the working environment with contractors (e.g. banter).</p>	<p>Contracts signed and where contractors do not have own equalities statement, they sign up to the Association's Equality & Human Rights Policy.</p> <p>Potential removal from list of contractors.</p>	<p>Hold meetings with contractors and go over specifics of harassment and clarity on expected behaviours.</p>	
4)	<p>Power imbalance / risk of exploitation.</p> <p>Employees in subordinate positions, or early in their career, may be at higher risk of experiencing sexual harassment and may be less likely to speak up (due to fear of consequences).</p>	<p>Robust policies in place to support employees and reinforce expected behaviours, including:</p> <ul style="list-style-type: none"> ▪ Dignity at Work Policy ▪ Grievance Policy ▪ Disciplinary Policy (including discrimination, bully and harassment considered as gross misconduct). ▪ Code of Conduct ▪ Equalities & Human Rights Policy ▪ Whistleblowing Policy ▪ Recruitment, Selection & Induction 	<p>Introduce a performance management policy with clear framework (to support an open and transparent performance process).</p>	

	Potential Hazard & Potential Harm	Existing Controls	Further Action Required	Outcome												
5)	<p>Social Events. Alcohol consumption can impair judgement and lower inhibitions, potentially leading individuals to behave in ways that they would not while sober.</p>	Policies in place (as detailed in 4).														
6)	<p>Cultural norms. Workplace culture that tolerates certain attitudes, inappropriate behaviours and stereotypical views where employees are not treated with dignity and respect may make staff more vulnerable to sexual harassment (e.g. comments being dismissed as banter).</p>	Policies in place (as detailed in 4).	<p>Introduce behaviour / competency framework, to further reinforce expected behaviours.</p> <p>Explore training requirements for all employees.</p>													
7)	<p>Social media / contact between employees. Employees may engage in unwanted and inappropriate contact with colleagues via interactive communication platforms such as Facebook, X, WhatsApp and LinkedIn.</p>	Policies in place (as detailed in 4).	Review Code of Conduct & Social Media policies to ensure robust guidance and expectations are in place.													
8)	<p>Lack of diversity. A lack of diversity in leadership and managerial roles can result in a significant power imbalance, which may lead to women and groups from other underrepresented backgrounds throughout the organisation feeling marginalised, more vulnerable to sexual harassment and less empowered to speak up due to fear of retaliation.</p>	<p>Balanced Leadership and Senior Management Team.</p> <table border="1" data-bbox="692 1118 1153 1326"> <thead> <tr> <th></th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr> <td>CEO</td> <td>0</td> <td>1</td> </tr> <tr> <td>Leadership</td> <td>2</td> <td>2</td> </tr> <tr> <td>SMT</td> <td>3</td> <td>3</td> </tr> </tbody> </table>		Female	Male	CEO	0	1	Leadership	2	2	SMT	3	3		
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