



POLICY

DIGNITY AT WORK (incorporating Bullying & Harassment Policy)

1 Introduction

RBLI is committed to ensuring equal opportunity and fair treatment in the workplace for all staff.

One of the key aims of the Company is to provide a working environment in which all staff feel comfortable and safe and in which everyone is treated with respect and dignity, free from any form of bullying or harassment, regardless of gender, sexual orientation, transgender status, marital or family status, colour, race, nationality, ethic or national origins, creed, culture, religion or belief, age, disability or any other personal factor or quality. These are known as 'protected characteristics'.

RBLI will not tolerate any form of bullying or harassment of our staff, or abusive, violent or aggressive behaviour towards them. We regard abusive, violent or aggressive behaviour as any behaviour which produces damaging or hurtful effects, whether physically or emotionally, on an employee. Nor will RBLI will condone or tolerate any form of harassment, bullying or intimidation, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers

This policy is to provide a framework for resolving complaints of harassment or bullying and for stopping any behaviour that is causing offence or distress both in the workplace and in any work-related setting outside the workplace, for example during business trips, external training events or at work-related social events. It provides a route for members of staff who believe that they have been harassed or bullied, to raise a complaint either informally or formally. The Company will treat all complaints of harassment seriously and will investigate them promptly, efficiently and where possible, in confidence.

Employees have a duty to co-operate with the Company to make sure that this policy is effective in preventing harassment or bullying. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful harassment, bullying or intimidation. Serious breaches of this Dignity at Work policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal.

2. Bullying and harassment

- 2.1 Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.
- 2.2 An employee unlawfully harasses another employee if they engage in unwanted conduct of a sexual nature and/or related to a protected characteristic, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee, and because of that other employee's rejection of or submission to the conduct, they treat

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that other employee less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the protected characteristic of a third party with whom the employee is associated and not on the employee's own protected characteristic, or if it was directed at someone other than the employee, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that an employee has a particular protected characteristic, when in fact they do not.

- 2.3 Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "office banter" may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.
- 2.4 Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way.
- 2.5 With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Examples

- Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:
 - unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature
 - subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to a protected characteristic
 - the offer of rewards for going along with sexual advances or threats for rejecting sexual advances
 - jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory in relation to a protected characteristic
 - demeaning comments about an employee's appearance
 - questions about an employee's sex life
 - the use of nicknames related to a protected characteristic whether made orally or in writing e.g. by e-mail
 - picking on or ridiculing an employee because of a protected characteristic
 - isolating an employee or excluding him or her from social activities or relevant work-related matters because of a protected characteristic.

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3. Right to report harassment/bullying

- 3.1 Employees have an absolute right to complain if they are treated in a manner that they believe constitutes harassment or bullying. This will include behaviour that has caused offence, humiliation, embarrassment or distress. Employees who raise a genuine complaint under this policy will not be subjected to any unfavourable treatment or victimisation as a result of making it. It may be helpful to review the Whistleblower's Policy to understand the full details of this protection.
- 3.2 However, if it is established that an employee has made a deliberately false or malicious complaint against another person about harassment or bullying, disciplinary action may be taken against that employee.
- 3.3 Any employee who witnesses an incident that he/she believes to be the harassment or bullying of another member of staff should report the incident in confidence either to their line manager or to a member of the HR Department. The Company will take all such reports seriously and will treat the information in strict confidence as far as it is possible to do so, and will be guided by the Whistleblower's Policy.

4. How to make a complaint

- 4.1 Before raising a formal complaint, the employee is encouraged in the first instance to talk directly and informally to the person whom he/she believes is harassing him/her and explain clearly what aspect of the person's behaviour is unacceptable, or is causing offence, and request that it stop. It may be that the person whose conduct is causing offence is genuinely unaware that his/her behaviour is unwelcome or objectionable and that a direct approach can resolve the matter without the need for formal action.
- 4.2 Where an employee would like support to make such an approach, he/she should contact their Line Manager in the first instance or a member of the HR Department. Due to the sensitive nature of some types of harassment employees may request to speak with a member of the same gender as them.
- 4.3 If, however, the employee feels unable to take this course of action, or if he/she has already approached the person to no avail, or if the harassment is of a very serious nature, he/she may choose to raise a formal complaint. Formal complaints may be raised with either their line manager or, if preferred, a member of the HR Department.

In bringing a complaint of harassment/bullying, the employee should be prepared to state:

- the name of the person whose behaviour he/she believes amounts to harassment or bullying;

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- the type of behaviour that is causing offence, together with specific examples if possible;
- dates and times when incidents of harassment or bullying occurred, and where they occurred;
- the names of any employees who witnessed any incidents, or who themselves may have been the victims of harassment or bullying by the same person; and
- any action that the employee has already taken to try to deal with the harassment.

4.4 Alternatively, you may, if you wish, use the Company's Grievance procedure to make a complaint of bullying and/or harassment.

5. Responsibility of line managers to deal with complaints

All allegations of harassment will be taken seriously and investigated promptly.

5.1 Managers who receive a complaint of harassment have a duty to investigate the matter thoroughly and objectively and to take corrective action in order to ensure that the employee's dignity at work is not compromised.

Line managers should be responsive and supportive towards any worker who raises a genuine complaint of harassment or bullying.

5.2 All incidents of harassment/bullying must be reported to the Human Resources department by the Line Manager. The Human Resources department will assist any Line Manager in dealing with complaints of harassment or bullying.

5.3 Line Managers are responsible for ensuring they actively promote dignity at work within the departments for which they are responsible.

5.4 The Company reserves the right, at its discretion, to suspend any employee who is under investigation for harassment or bullying for a temporary period whilst investigations are being carried out. Such suspension will be for as short a time as possible and will be on full pay.

5.5 Any employee accused of harassment or bullying will be informed of the exact nature of the complaint against him/her and afforded a full opportunity to challenge the allegations and put forward an explanation for his/her behaviour in a confidential interview, with a companion present if he/she wishes. No employee will be presumed guilty following an allegation of harassment or bullying against him/her.

5.6 The Company regards all forms of harassment and bullying as serious misconduct, and any employee who is found to have harassed or bullied a colleague will be liable to disciplinary action up to and including summary dismissal.



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- 5.7 The Company will maintain records of investigations into alleged incidents of harassment or bullying, the outcome of the investigations and any corrective or disciplinary action taken. These records will be maintained in confidence and in line with the provisions of the Data Protection Act 1998.

This policy will be reviewed at least annually to ensure compliance with statutory requirements. Any queries regarding this policy, or comments, should be addressed to your line manager or the HR department.

Originator's Signature:

A handwritten signature in black ink, appearing to read 'Steve Sherry', with a long horizontal stroke extending to the right.

Name:

Steve Sherry

Position in Company:

Chief Executive