



## **Anti-Bullying, Harassment, and Sexual Harassment Policy**

### **Policy Statement**

A Rapid Response Security Ltd is committed to creating and maintaining a working environment where every employee, workers (including agency), contractor, apprentice, or volunteer is treated with dignity and respect.

We are dedicated to ensuring the workplace is free from all forms of bullying, harassment, and sexual harassment, including by third parties such as clients, customers, and suppliers.

Bullying and harassment of any form will not be tolerated, and all employees have the right to work in an environment that is free from intimidation, hostility, or offence. This policy outlines the responsibilities and procedures for dealing with bullying, harassment, sexual harassment, and third-party harassment.

### **Scope of the Policy**

This policy applies to all employees, contractors, agency staff, volunteers, apprentices, and anyone working on behalf of the Company. It covers:

- Behaviour that takes place in the workplace.
- Conduct during work-related activities such as business trips, social events, or at client and supplier locations.
- Online behaviour or incidents outside of work that affect the work environment or relationships.
- Third-party harassment, including by clients, suppliers, customers, or other external stakeholders.

### **Definitions**

#### **Bullying**

Bullying is defined as behaviour that is offensive, intimidating, malicious, or insulting. It is an abuse or misuse of power that undermines, humiliates, or causes harm to the person on the receiving end.

Examples include:

- Persistent, unjustified criticism or spreading malicious rumours.
- Excluding someone from team communications or activities.
- Public humiliation or ridicule.
- Abuse of power by those in senior positions, such as assigning an unreasonable workload or overbearing supervision.
- Deliberately assigning someone tasks designed to make them fail.

Bullying can be physical, verbal, or non-verbal, and may not always be easily recognised.



### **Harassment**

Harassment occurs when one person engages in unwanted conduct related to a protected characteristic that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation

### **Examples of Harassment Include:**

- Offensive comments, jokes, or mimicry based on race, gender, or other protected characteristics.
- Displaying offensive images, symbols, or graffiti.
- Unwanted physical contact, gestures, or aggressive physical posturing.
- Spreading malicious rumours or gossip about an individual's personal or professional life.
- Deliberate exclusion from meetings, communications, or social events.

The unwanted nature of the behaviour distinguishes harassment from friendly, consensual interactions. It is the impact on the recipient that defines the behaviour as harassment, regardless of the perpetrator's intent.

### **Sexual Harassment**

Sexual harassment is a specific form of harassment that involves unwanted conduct of a sexual nature. It is unlawful under the Equality Act 2010 and can occur between individuals of the same or different genders.

### **Examples of Sexual Harassment:**

Sexual harassment may include:

- Unwanted sexual advances, propositions, or invitations.
- Displaying sexually explicit materials such as images, posters, or videos in the workplace.
- Lewd comments, gestures, or innuendos.
- Intrusive questions about a person's private or sexual life.
- Repeated and unwelcome sexual advances or physical contact, such as touching, hugging, massaging, or kissing.
- Sending or displaying sexually explicit messages, emails, or social media content.
- Spreading sexual rumours or making degrading comments about someone's appearance.
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- Offering benefits (such as promotions) in return for sexual favours, or making threats for refusal.

### **Third-Party Harassment**

Third-party harassment refers to any form of bullying, harassment, or sexual harassment of employees by individuals who are not directly employed by the Company, including clients, customers, suppliers, contractors, or members of the public.

#### **Examples of Third-Party Harassment:**

- A customer making sexual comments towards an employee in the workplace.
- A supplier or client making racially offensive or derogatory remarks.
- Aggressive behaviour, bullying, or threats from a visitor to the workplace.
- Repeated unwanted invitations or social advances from third parties during work-related interactions.

### **Employer Responsibilities Regarding Sexual Harassment**

A Rapid Response Security Ltd recognises the serious impact of sexual harassment on employees and is committed to taking proactive and responsive steps to prevent and address it. The following outlines our responsibilities in this regard:

#### **Preventative Measures**

- **Policy Communication:** Ensure that this policy is clearly communicated to all employees, contractors, and third parties. Sexual harassment awareness will be integrated into the employee handbook and onboarding materials for all new hires.
- **Training Programs:** Implement comprehensive training on sexual harassment prevention for all employees and managers. This includes understanding what constitutes sexual harassment, how to report it, and how to intervene when witnessing inappropriate behaviour.
- **Leadership Accountability:** Encourage managers and leadership to model appropriate behaviour and hold them accountable for maintaining a safe and respectful work environment. Managers will be given specific training to help them identify and prevent sexual harassment in their teams.
- **Risk Assessments:** Conduct regular risk assessments of the workplace to identify areas where sexual harassment risks may be higher (e.g., isolated working environments, off-site events) and take measures to reduce those risks.

#### **Reporting and Investigation of Sexual Harassment**

- **Reporting Channels:** Provide employees with accessible channels for reporting sexual harassment, including the option to report anonymously.
- **Prompt Response:** Ensure that all reports of sexual harassment are dealt with promptly, confidentially, and impartially. Employees who report sexual harassment will not face any form of retaliation.
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- **Impartial Investigations:** Assign neutral investigators to handle complaints. Investigations will be impartial and will aim to be resolved within a reasonable timeframe.
- **Confidentiality:** Protect the confidentiality of those involved in sexual harassment investigations. Information will only be shared with those who need it to understand and address the complaint.

#### Support for Victims of Sexual Harassment

- **Workplace Adjustments:** Provide workplace adjustments for victims of sexual harassment where necessary (e.g., temporary changes to reporting lines or work locations) to ensure they feel safe and supported.
- **Ongoing Check-ins:** the line manager will follow up with the affected employee after the resolution of the case to ensure their well-being and to monitor the continued safety of their work environment.

#### Disciplinary Action and Accountability

- **Zero Tolerance:** Take disciplinary action against individuals who are found to have committed sexual harassment. This may include verbal or written warnings, suspension, or termination of employment, depending on the severity of the misconduct.
- **Consequences for Leaders:** Ensure that managers or leaders who fail to address or report known incidents of sexual harassment are also held accountable.
- **Criminal Proceedings:** If the behaviour is deemed criminal, the Company will cooperate fully with law enforcement.

#### Creating a Safe Reporting Environment

- **No Retaliation:** Enforce a strict no-retaliation policy for employees who report sexual harassment. Retaliation against those who come forward will be treated as a serious disciplinary offence and may lead to dismissal.
- **Encouraging Bystander Reporting:** Encourage employees to report sexual harassment, even if they are not the direct victims. Bystanders who witness inappropriate conduct should feel empowered to report it without fear of retribution.

#### Preventing and Addressing Sexual Harassment by Third Parties

- **Third-Party Awareness:** Ensure that clients, customers, suppliers, and other third parties who interact with the Company understand that sexual harassment of our employees will not be tolerated. Notices will be displayed, and third parties will be informed of our zero-tolerance policy.
- **Addressing Incidents:** In cases of sexual harassment by third parties, the Company will take appropriate action, which may include issuing warnings, banning the individual from the premises, or terminating contracts with the offending party.
- **Support for Employees:** Employees harassed by third parties will be provided with the same level of support and access to reporting channels as if the harassment were committed by an internal party.



## **Reporting Bullying, Harassment, and Sexual Harassment**

### **Informal Resolution**

Where appropriate, employees who experience bullying or harassment (including sexual harassment) may choose to address the behaviour informally. This could, if the employee is comfortable doing so, involve speaking directly with the perpetrator to explain that their behaviour is unwanted and must stop. Employees may also seek support from their manager or the Office Manager to resolve the issue informally through mediation or a facilitated conversation.

### **Formal Complaints Procedure**

If informal resolution is not appropriate or unsuccessful, employees are encouraged to file a formal complaint. Complaints should be submitted in writing to the Office Manager or the employee's line manager and include specific details of the behaviour, the names of those involved, the dates and times of the incidents, and any witnesses.

### **Investigation Process**

All complaints will be handled in a timely and impartial manner, and the process will include:

1. Appointment of a neutral investigator to review the complaint.
2. Interviews with the complainant, the alleged perpetrator, and any witnesses.
3. Collection and examination of any relevant documentation (e.g., emails, text messages, or other evidence).
4. Providing both parties with information about the outcome of the investigation.

### **Disciplinary Action**

If bullying, harassment, or sexual harassment is found to have occurred, appropriate disciplinary action will be taken, which may include:

- Verbal or written warnings.
- Suspension of the perpetrator.
- Termination of employment, depending on the severity of the behaviour.

### **Third-Party Harassment**

In cases of third-party harassment, appropriate actions will be taken, which may include:

- Issuing warnings to the client, customer, or supplier.
- Banning the individual(s) from the premises.
- Reporting the incident to law enforcement if the behaviour is criminal.

### **False or Malicious Complaints**

While the Company takes all complaints seriously, any employee found to have made a malicious or false complaint will be subject to disciplinary action, up to and including termination of employment.

### **Responsibilities of Employees**

All employees are responsible for:



- Treating colleagues, clients, and third parties with respect and refraining from any form of bullying, harassment, or sexual misconduct.
- Reporting any incidents of bullying, harassment, or sexual harassment they experience or witness.
- Cooperating with investigations by providing honest and accurate information.

This policy is authorised by;

M A Rana  
Director