

Anti-harassment & Anti-bullying Policy

Introduction

eQuality Solutions Group Ltd and all its subsidiaries are committed to upholding our pledge to this policy, ensuring that every action we take reflects our core values of Equity, Pride, Purpose, Integrity and Courage. This policy is more than just a statement, it is a reflection of who we are and what we stand for, guiding us toward meaningful impact and lasting change.

Purpose

This policy sets out our Group's rules in relation to protecting our culture and our people by seeking to eradicate bullying, harassment or victimisation at work by setting out the steps we will take to investigate and deal with complaints of bullying, harassment or victimisation, and how we support those affected.

The Group recognises that harassment and victimisation is unlawful under the Equality Act 2010 (EqA). As such, harassment, or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable and will not be tolerated.

The policy accompanies our Equality and diversity policy, relates to job applicants and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

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

Scope

This policy applies to anyone working for us. This includes employees, workers, contractors, volunteers, interns and apprentices.

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Our commitment to you

The Group are committed to taking proactive measures to prevent all forms of bullying and harassment, including sexual harassment, of our employees by:

- ensuring all new starters attend equality, diversity and inclusion training and sexual harassment training, as part of their onboarding programme;
- requiring all employees to attend regular equality, diversity and inclusion training and anti-bullying and anti-harassment training on at least an annual basis;
- providing additional training for line managers to ensure that they understand how to implement this policy effectively and their role in preventing and stopping bullying and harassment from occurring in the workplace and by third parties that they may have contact with;
- encouraging individuals to support our equality, diversity and inclusion, and anti-bullying and anti-harassment, initiatives by attending events and workshops organised by the Group to educate themselves on the challenges faced by others and how to help alleviate these in the workplace;
- monitoring our workplace culture through anonymous surveys, exit interviews, one-to-one conversations, return-to-work meetings, and employee resource groups to identify and address any issues;
- undertaking regular risk assessments to determine reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace and by third parties that they may have contact with; and
- ensuring that our **zero-tolerance** approach to all forms of discrimination, and bullying and harassment, is communicated to all workers and third parties that they may have contact with.

The Group believe that having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and to the organisational environment we wish to protect.

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Everyone within the eQS Group is entitled to be treated with dignity and respect in their place of work. This means freedom from all forms of harassment, including sexual harassment, feeling safe and supported and having access to redress if such behaviour does arise.

A toxic workplace culture, where bullying or harassment is tolerated, is harmful to the wellbeing of the workforce as well as the wider organisation.

The Group therefore adopt a **zero-tolerance** approach to all instances of bullying or harassment. This includes all forms of sexual harassment.

What we expect from our people

The Group expects every one of our people, to take personal responsibility for observing, upholding, promoting, and applying this policy. Whatever their job is, this is part of their role.

Any dealings you have with third parties, including customers, suppliers, contractors, agency staff and consultants, must be free from discrimination, harassment, victimisation, or bullying.

If any of our people are found to have committed, authorised, or condoned an act of bullying or harassment, the Group will act against them (for those to whom it applies) under our Disciplinary procedure, up to and including dismissal.

There is no justifiable reason to bully or harass someone else. For example, observing a particular religion is not a legitimate reason for bullying or harassing a colleague because of their sexual orientation. Even if there is no intention to bully or harass someone else, this does not legitimise the behaviour as it is the impact on the recipient that is important.

Everyone within the Group should be aware that they can be personally liable for harassment.

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If any of our people experience bullying or harassment, the Group encourage them to speak up without delay and to ask for appropriate support (see *What to do if you are subject to harassment, bullying or victimisation*).

Who is protected from harassment

The Group is committed to protecting everyone it interacts with, creating an inclusive and respectful environment for all.

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation; and
- age.

Although pregnancy and maternity, marriage and civil partnership and menstruation and menopause are not specifically protected under the legal provisions on harassment, the Group consider harassment on any ground to be unacceptable.

Meaning of harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

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Harassment can occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not.

Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic, for example having a family member of a particular religion.

Examples of harassment

Harassment can occur in many forms, and can take place either at work, outside work, in person, or online. While this is not an exhaustive list, examples include:

- "banter", jokes, taunts, or insults that are sexist, racist, ageist, transphobic, homophobic, or derogatory against any other protected characteristic;
- unwanted physical behaviour, for example, pushing or grabbing;
- excluding someone from a conversation or a social event or marginalising them from the group;
- derogatory comments about pregnancy, maternity leave, or IVF treatment;
- mimicking or making fun of someone's disability;
- derogatory or offensive comments about religion;
- unwelcome comments about someone's appearance or the way they dress that is related to a protected characteristic;
- "outing" (i.e. revealing their sexual orientation against their wishes), or threatening to "out", someone;
- consistently using the wrong names and pronouns following the transition of a person's gender identity;
- displaying images that are racially offensive; and

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- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

Meaning of sexual harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, an agent of an organisation, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour. Examples of sexual harassment include, but are not limited to:

- sexual comments or jokes, which may be referred to as “banter”
- displaying sexually graphic pictures, posters, or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person’s private or sex life or a person discussing their own sex life
- sexual posts or contact in online communications, including on social media
- spreading sexual rumours about a person
- sending sexually explicit emails, text messages or messages via other social media
- unwelcome touching, hugging, massaging, or kissing.

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Victimisation

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws.

These are outlined below. It is not necessary for the person to have carried out the protected act for detrimental treatment to be considered as victimisation.

The protected acts are:

- making a claim or complaint under the EqA (e.g. for discrimination or harassment)
- helping someone else to make a claim by giving evidence or information in connection with proceedings under the EqA
- alleging that someone has breached the EqA
- doing anything else in connection with the EqA.

Examples of victimisation

- failing to consider someone for promotion because they have previously made a sexual harassment complaint
- dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint
- excluding someone from work meetings because they gave evidence as a witness for another employee in an employment tribunal claim related to sexual harassment.

Bullying

There is no legal definition of bullying. However, the Group regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient.

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Bullying can be physical, verbal, or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media, including messaging services such as WhatsApp. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment).

Examples of bullying

While this is not an exhaustive list, bullying may include:

- physical, verbal, or psychological threats;
- Doing things to make someone seem unskilled or unable to do their job properly;
- Undermining someone's authority;
- Refusing to complete tasks;
- excessive levels of supervision; and
- inappropriate and derogatory remarks about a person's performance.

It is important to understand that legitimate, reasonable, and constructive criticism of a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to bullying.

Microaggressions

Microaggressions - sometimes called micro-incivilities - are statements, action, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority. They are sometimes referred to as "death by a thousand cuts". Microaggressions generally take one of three forms:

- **Micro-assaults:** Conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example directing

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limp-wristed hand gestures towards a gay colleague and saying, "It's just a joke".

- **Micro-insults:** Unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability "You don't look disabled to me".
- **Micro-invalidations:** Where a person denies, or seeks to cancel, the feelings and lived experiences of a marginalised individual or group, for example a white person saying, "I don't think the UK has a problem with racism - some people are just too sensitive".

Serious microaggressions can amount to unlawful harassment, bullying or discrimination but even less serious microaggressions can negatively impact the health and wellbeing of the person experiencing them.

Circumstances which are covered

This policy covers behaviour which occurs in the following situations:

- a work situation
- a situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch, a business trip, or social functions
- outside of a work situation but involving a colleague or other person connected to the Group, including on social media
- against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role.

What to do if you are subject to harassment, bullying or victimisation

The Group are committed to ensuring that there is harassment, bullying or victimisation in our workplace. Allegations of such behaviours will be treated as a disciplinary matter, although every situation will be considered on an

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individual basis and in accordance with the principles of our disciplinary procedures, a copy of which is available from the People & Culture team.

The law requires employers to take reasonable steps to prevent sexual harassment of their workers. The Group take action to prevent sexual harassment from occurring and have clear reporting procedures for any of our people to make a complaint about sexual harassment.

If they have been sexually harassed, or have witnessed sexual harassment, the Group encourage them to tell us so that the matter can be dealt with swiftly.

Informal complaint

The Group recognise that complaints of harassment, including sexual harassment, bullying or victimisation can be of a sensitive or intimate nature and that it may not be appropriate for an individual to raise the issue through our normal grievance procedure.

In these circumstances, they are encouraged to raise such issues with a senior colleague of their choice (whether or not that person has a direct supervisory responsibility for them) as a confidential helper. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

If any of our people feel comfortable to do so, they can make it clear to the individual on an informal basis that their behaviour is unwelcome and to ask them to stop. They may not be aware that their behaviour is offending them.

If they feel unable to do this verbally then they can hand a written request to the individual, and their confidential helper can assist them in this.

In addition, they may also choose to raise concerns during their regular communication with their manager, e.g. in a one-to-one meeting. The manager will listen to them and take their concerns seriously if they do this but may encourage them to follow the reporting procedures set out below. If

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they do not have a one-to-one meeting scheduled with their manager, they can ask to meet with them to discuss any concerns that they may have.

Alternatively, if any of our people do not feel up to speaking directly to the individual, their manager, or a colleague, they may wish to speak to the People & Culture team for support.

Any of our people may or may not want the Group to talk to the individual on their behalf and, where possible, the Group will respect their wishes. However, if the welfare or safety of them or others is at risk or where the allegations are particularly serious, the Group may have to approach the individual and instigate a formal investigation. In such a case the Group will, where possible, discuss this with the complainant first.

If an employee would prefer not to discuss the issue with anyone at work, help and support is also available through our employee assistance programme (EAP). Employees can use our EAP to speak to an independent adviser on a confidential basis about any issue that is troubling them. See Support for those affected or involved for details of how to access our EAP.

Formal route

Where the informal approach fails or if the harassment, bullying or victimisation is more serious, an individual should bring the matter to the attention of their line manager as a formal written complaint and again their confidential helper can assist them in this.

Alternatively, you can report instances by visiting [“Tell us what happened”](#) Our online means of reporting sexual harassment are continually monitored, and you will be contacted within five working days of making the complaint.

If possible, they should keep notes of what happened so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment

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- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by you to stop the alleged harassment.

Anyone can raise a formal complaint of bullying, harassment or victimisation under the Group's Grievance procedure if it applies to them. However, they may prefer to do so under this policy because it is specifically aimed at dealing with such issues. They should be aware that they cannot raise a complaint under this policy if they have raised a complaint about the same issue already under the Grievance procedure.

Under the formal procedure within this policy, the Group will usually:

- ask them to set out their complaint in writing and include as much detail as possible, for example the alleged bully/harasser's name, the nature of the bullying/harassment, the dates of the alleged acts of bullying/harassment, names of any witnesses, and details of any action taken to address the matter so far;
- hold a meeting with the alleged bully/harasser to ascertain their response to the allegations;
- carry out further investigations where necessary, including interviewing potential witnesses who we will instruct to keep the matter confidential;
- invite them to a meeting to discuss their complaint in full and where they will have the right to be accompanied by a colleague or trade union representative;
- hold a meeting with them to enable us to ask further questions considering any information gathered from the alleged bully/harasser and/or witnesses;
- consider all the evidence in full and make a decision; and
- inform the complainant of our decision and, if the Group uphold the complaint, instigate disciplinary action up to and including dismissal against the bully/harasser.

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The Group will investigate fully every formal complaint in an objective and confidential way, while also ensuring that we respect the complainant's rights as well as the rights of the alleged bully/harasser.

The Group will use every effort to complete an investigation into bullying or harassment as quickly as possible.

Where the alleged bully/harasser is a third party, the Group may need to adjust the procedure under this policy to ensure we conduct appropriate investigations, and this will be discussed with the complainant.

Appeals

If any of our people are not satisfied with the outcome of the formal investigation, they have the right to appeal.

Should they wish to appeal, they should write to the People & Culture team setting out what aspects of the decision they are unhappy with and the reasons why. Appeals should be submitted without unreasonable delay and usually no longer than seven working days after receipt of the decision outcome letter.

An appropriate independent person will then arrange an appeal meeting with them to discuss their appeal in full and to try and reach a satisfactory solution. They must take all reasonable steps to attend this meeting and may be accompanied by a colleague or trade union representative.

The People & Culture team will then write to them to confirm the outcome of the appeal, which will be final.

Third parties

The Organisation reserves the right to engage an independent third party to assist at any stage of the disciplinary procedure.

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What to do if you witness harassment, bullying or victimisation

If any of our people witness bullying, harassment or victimisation, they are encouraged to take appropriate action to address it. They should not take any action that may put the alleged victim at any further risk or other harm, or any harm to themselves.

If they feel able, they should intervene to prevent the matter continuing. If they cannot do this, their action may include offering support to the person who has experienced the behaviours or actions and encouraging them to report the incident or reporting the incident themselves.

If reporting the incident, they should bring the matter to the attention of the People & Culture team in writing. Alternatively, they can report instances of sexual harassment by "[Tell us what happened](#)". Our online means of reporting sexual harassment are continually monitored to ensure that incidents are dealt with as soon as possible.

Any concerns will be handled by the People & Culture team who will sensitively talk to the person subject to the behaviours or actions to determine how they want the matter to be handled.

Third-party sexual harassment

Third-party bullying, harassment or victimisation occurs when a member of our workforce is subjected to these behaviours or actions by someone who is not part of our workforce but who is encountered in connection with work.

This includes our customers, suppliers, members of the public, clients, people using our service, friends and family of colleagues, delegates at a conference, audiences, and self-employed contractors.

Third-party bullying, harassment (including sexual harassment) or victimisation of our workforce is unlawful and will not be tolerated. The law requires

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employers to take steps to prevent sexual harassment by third parties and we are committed to doing so.

The law does not provide a mechanism for individuals to bring a claim of third-party harassment alone. However, failure for an employer to take reasonable steps to prevent third-party sexual harassment may result in legal liability in other types of claims.

To prevent third-party bullying and harassment (including sexual harassment) from occurring, we will:

- attach signage to the walls of the areas within the workplace where clients are present to warn that all forms of bullying and harassment of our staff is not acceptable
- inform third parties (i.e. suppliers, clients, and customers) of our zero-tolerance sexual harassment policy via a statement on our website

If any of our people have been subjected to third-party bullying, harassment or victimisation, they are encouraged to report this as soon as possible to their line manager. Alternatively, you can report instances of third-party sexual harassment by emailing hr@e-q-s.com or by visiting [“Tell us what happened”](#). Our online means of reporting sexual harassment are continually monitored.

Should a customer sexually harass a member of our workforce, we will take immediate and appropriate action. Any criminal acts will be reported to the police regardless of the perceived severity of the incident.

We will not tolerate any form of bullying or harassment by any member of our workforce against a third party. Instances of bullying or harassment of this kind may lead to disciplinary action, including termination of employment.

Support for those affected or involved

The Group understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and will do what we can to support employees.

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Anyone that feels they cannot continue to work in close contact with the alleged bully/harasser, the Group will consider seriously any requested changes to their working arrangements during our investigation into the matter.

For emotional support, employees can access free, confidential counselling from our EAP. To access the EAP website, go to <https://online.bhsf.co.uk/portal/customer/logon>, with their username and password or contact them directly on 0800 107 6145.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If they feel they have suffered such victimisation, please inform the People & Culture team as soon as possible.

Regardless of the outcome of your complaint, the Group will consider carefully how to best approach any ongoing working relationship between them and the individual concerned, including any third party. For example, depending on the specific circumstances, we may consider amending the job duties, location or reporting lines of either the complainant or the other person. Alternatively, we may decide workplace mediation or counselling is appropriate.

Sensitivity and confidentiality

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

If anyone is found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, the Group may take disciplinary action against them up to and including dismissal (or other appropriate action for non-employees).

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Consequences of breaching this policy

If, following a formal investigation, the Group find that anyone has committed, authorised, or condoned an act of bullying, harassment or victimisation, the Group will deal with the issue as a case of misconduct or gross misconduct.

The Group may take disciplinary action against them, up to and including dismissal (or other appropriate action for non-employees). They should be aware that any aggravating factors, such as abuse of power over a more junior colleague, will be considered in deciding what disciplinary action to take.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If the Group find that they have victimised anyone in this way, we will instigate disciplinary action against them up to and including dismissal (or other appropriate action for non-employees).

If, due to the investigation, it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against the complainant.

Employees should refer to our Disciplinary procedure for further information.

Training

The Group provide training to all our staff on sexual harassment to ensure there is a clear understanding of:

- what sexual harassment is, how it may occur and that it will not be tolerated
- expected levels of behaviour
- how they can report any incidents of having been sexually harassed or having witnessed it
- how acts of harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal.

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The Group ensure that all levels of management are trained on implementing this policy, including preventing and managing sexual harassment in the workplace and the procedure to follow if an allegation is reported. The Group will regularly review the effectiveness of our training.

The Group will provide refresher training as appropriate.

Record-keeping

We process personal data collected in relation to bullying or harassment complaints in accordance with our data protection policy. Data collected in relation to the investigation of bullying or harassment complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints and investigating.

The Group will analyse data around allegations of bullying or harassment (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our wider equality, diversity, and inclusion strategy.

Everyone should immediately report any inappropriate access or disclosure of employee data in accordance with our Data protection policy as this constitutes a data protection breach. It may also constitute a disciplinary offence, which we will deal with under our disciplinary procedure.

Monitoring arrangements

This policy is reviewed annually and, if necessary, amended to ensure that it remains effective.

Reviewed in July 2025 – next review in July 2026 unless legislation or Operational guidance changes in the interim.