HARASSMENT AND BULLYING POLICY

1. ABOUT THIS POLICY

1.1 Quality Pipe Supports Ltd (QPS) (We, us) are committed to a workplace where everyone is treated with dignity and respect. We do not tolerate bullying or harassment of any kind, whether by people who work for us or by anyone else our staff deal with in the course of their work.

1.2 This policy:

(a) explains what we mean by bullying, harassment and sexual harassment;

(b) sets out the standards of behaviour we expect;

(c) explains how we protect staff from harassment by customers, clients, suppliers, visitors and other people who do not work for us;

(d) explains how to report a concern and what will happen when you do; and

(e) sets out the steps we take to stop harassment happening in the first place.

1.3 This policy applies to everyone who works for us, including employees, workers, agency workers, casual workers, apprentices, interns and volunteers. Contractors and consultants must also follow it while they are working with us.

1.4 This policy does not form part of any contract of employment, and we may amend it at any time. It should be read alongside our Grievance Policy, Disciplinary Policy, Whistleblowing Policy and Data Protection Policy.

2. OUR COMMITMENT AND LEGAL DUTIES

2.1 The law requires us to take all reasonable steps to prevent sexual harassment of our staff in the course of their work. This covers sexual harassment by colleagues and by people who do not work for us.

2.2 The law also makes us responsible if someone who does not work for us, such as a customer, client, supplier, contractor or member of the public, harasses any of our staff in the course of their work and we have not taken all reasonable steps to prevent it.

2.3 We take these duties seriously. We do not wait for something to go wrong before acting. The steps we take are set out in section 12 and include assessing risk, training, clear reporting routes and acting promptly on every concern.

2.4 Launa Hamer (Financial Director) is our Senior Lead for preventing harassment. They are responsible at senior level for this policy, for making sure the steps in it are carried out and for reviewing all reports of harassment. You can contact them directly about any concern.

3. WHAT IS BULLYING?

3.1 Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates or harms the person on the receiving end.

3.2 Bullying can be a single serious incident or a pattern of behaviour. It can happen face to face, by telephone, by email, by message or on social media, and it is not always obvious to others. Examples include:

(a) shouting at, belittling or humiliating someone, whether in private or in front of others;

(b) spreading malicious rumours or gossip;

(c) persistently criticising or undermining someone without good reason;

(d) deliberately excluding someone from work discussions, meetings or social events;

(e) deliberately overloading someone with work or setting deadlines that cannot be met; and

(f) threatening someone's job or making them feel unsafe.

3.3 Bullying is often linked to seniority, but not always. A manager can be bullied by members of their team, and colleagues at the same level can bully each other.

3.4 Fair and reasonable management is not bullying. Setting reasonable targets, giving honest feedback about performance or conduct and using our formal procedures fairly are all a normal part of working life.

4. WHAT IS HARASSMENT?

4.1 Harassment is unwanted conduct related to any of the following characteristics, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them:

(a) age;

(b) disability;

(c) gender reassignment;

(d) race, including colour, nationality and ethnic or national origin;

(e) religion or belief, including a lack of religion or belief;

(f) sex; and

(g) sexual orientation.

4.2 Sexual harassment is:

(a) unwanted conduct of a sexual nature which has the purpose or effect described in paragraph 4.1; or

(b) treating someone less favourably because they rejected, or gave in to, unwanted conduct of a sexual nature or unwanted conduct related to sex or gender reassignment.

4.3 Examples of harassment and sexual harassment include:

(a) unwelcome physical contact, from touching or brushing against someone through to assault;

(b) comments about someone's appearance, body or clothing;

(c) sexual comments, jokes or propositions, or intrusive questions about someone's private life;

(d) repeated requests for dates or other unwanted attention;

(e) displaying or sharing sexually explicit or offensive images, messages or other material, including on phones and social media;

(f) offensive jokes, nicknames, mimicry or so-called "banter" related to any of the characteristics in paragraph 4.1; and

(g) following someone or making unwanted contact with them outside work.

4.4 Harassment does not have to be intended. What matters is the effect of the conduct on the person on the receiving end, looked at sensibly in all the circumstances. "It was only a joke" or "it was just banter" is not an excuse.

4.5 Harassment can be a single incident. A person can also be harassed by conduct aimed at someone else, by conduct related to a characteristic they do not have (for example, because they are wrongly thought to have it) or because of their connection with someone who has it.

4.6 A person does not have to object at the time for conduct to be harassment. People often feel unable to speak up, particularly where the other person is more senior or is an important customer or client.

5. HARASSMENT BY PEOPLE WHO DO NOT WORK FOR US

5.1 In this policy, a "third party" means anyone who does not work for us. This includes customers, clients, suppliers, contractors and their staff, visitors, members of the public and people our staff meet at events, on visits or online.

5.2 This policy protects you from harassment by third parties in the same way as harassment by a colleague. It applies whenever you are working, including:

(a) at our premises and at the premises of customers, clients and others;

(b) on the telephone, by email, on video calls and online;

(c) at work-related events, conferences, training and client entertainment; and

(d) while travelling as part of your work.

5.3 No customer or client is too important for us to act. We will not put the value of a business relationship ahead of the safety and dignity of our staff.

5.4 To prevent harassment by third parties, we will:

(a) assess the risk of third-party harassment in our business and review that assessment regularly;

(b) make clear to customers, clients, suppliers and visitors that we do not tolerate harassment of our staff, including through notices, our website, our terms of business and our contracts;

(c) train our managers to recognise and respond to third-party harassment, and give them the authority to act; and

(d) take every report seriously and act on it promptly.

5.5 If you are harassed by a third party, or see it happen to someone else, report it in the same way as any other concern (see section 8). If it is happening now, tell your manager or the most senior person present straight away. You are entitled to step away from the situation and ask for a manager to take over.

5.6 Depending on the circumstances, the action we take may include:

(a) speaking to the person, or to their employer, to make clear that the behaviour must stop;

(b) ending a call, visit or meeting, or asking the person to leave our premises;

(c) giving a formal written warning;

(d) changing who deals with the customer or client, if the person who was harassed wants this;

(e) refusing further service, banning the person from our premises or ending the contract; and

(f) reporting the matter to the police where a crime may have been committed.

5.7 We will not move you off an account, change your duties or hours, or treat you less favourably in any other way because you have reported harassment by a third party. Any change made to protect you will be discussed with you first and, wherever possible, agreed with you.

6. STANDARDS OF BEHAVIOUR

6.1 We expect everyone who works for us to treat colleagues, customers, clients, suppliers and visitors with courtesy and respect. In particular, you must not:

(a) use offensive, abusive or aggressive language or gestures;

(b) make sexual comments, jokes or suggestions, or comments about anyone's appearance or body;

(c) make jokes, comments or so-called "banter" related to anyone's age, disability, gender reassignment, race, religion or belief, sex or sexual orientation;

(d) touch anyone inappropriately, invade their personal space or make unwanted advances;

(e) view, display or share sexually explicit, offensive or discriminatory material;

(f) mock, mimic or belittle anyone;

(g) spread gossip or rumours about colleagues;

(h) unfairly exclude anyone from work discussions, meetings or events; or

(i) behave in a physically threatening or aggressive way.

6.2 If you are unsure whether something is acceptable, do not say or do it.

7. WHERE THIS POLICY APPLIES

7.1 This policy applies:

(a) at work, wherever that is, including when working from home or remotely;

(b) at work-related social events, parties, client entertainment and conferences;

(c) on work trips and when travelling for work; and

(d) to contact with colleagues and others connected with our business outside working hours, including on social media and messaging apps.

7.2 Conduct outside work which is not covered above may still lead to disciplinary action if it affects your suitability for your role, your working relationships or our reputation.

8. HOW TO REPORT A CONCERN

8.1 If you are being bullied or harassed, or you see it happening to someone else, please tell us. We cannot deal with what we do not know about.

8.2 You can report a concern to any of the following:

(a) your line manager;

(b) Mike Herbert (Managing Director);

(c) our Senior Lead, (Launa Hamer)

8.3 You do not have to report to your line manager. If your concern involves your manager, someone your manager works closely with, or a customer or client your manager is responsible for, please use one of the other routes. If your concern involves the Senior Lead, report it to, Launa Hamer (Financial Director)

8.4 You can report a concern verbally or in writing. It helps if you can tell us what happened, when and where, who was involved and whether anyone else saw it. Keep a note of incidents if you can, but do not delay reporting while you gather information.

8.5 With minor issues between colleagues, some people feel able to tell the other person that their behaviour is unwelcome and ask them to stop. You do not have to do this, and you will never be expected to approach the person yourself.

8.6 If you have seen harassment or bullying, please report it, even if the person affected has not.

8.7 You may also raise a formal grievance under our Grievance Policy, which will be applied in line with this policy. Reporting sexual harassment may also be a protected disclosure under whistleblowing law, and you can raise concerns under our Whistleblowing Policy.

9. WHAT HAPPENS WHEN YOU REPORT A CONCERN

9.1 We will treat every report seriously and deal with it promptly and sensitively.

9.2 We will discuss with you how you would like the matter to be dealt with. That may be informally, for example by a manager speaking to the person concerned, or formally through an investigation. We will take your wishes into account. Where a concern is serious, or there is a risk to you or to others, we may need to investigate even if you would prefer us not to. If so, we will explain why and support you through it.

9.3 Any investigation will be carried out by someone who is not involved in the matter and has no conflict of interest. You may be accompanied at any formal meeting by a colleague or a trade union representative.

9.4 While a concern is being looked into, we may take temporary steps to protect those involved, such as changing working arrangements or rotas or, where appropriate, suspending the person complained about. These steps are not a judgement on the outcome. Where possible, any change will be made to the arrangements of the person complained about rather than the person who raised the concern.

9.5 We will tell you the outcome and, if your complaint is not upheld, explain why. You may appeal under our Grievance Policy.

9.6 Whatever the outcome, we will consider what support may help you and whether any steps are needed to prevent a repeat. We will not suggest mediation in a case of sexual harassment unless you ask for it.

9.7 We will keep a confidential record of every report, including informal ones, and of the action taken. The Senior Lead will review these records regularly to identify any patterns and to decide whether further preventative steps are needed.

10. PROTECTION FROM VICTIMISATION

10.1 No one will be treated less favourably because they have reported harassment or bullying, supported someone who has, given information in an investigation or otherwise acted under this policy. This includes being moved, overlooked for opportunities, excluded or made the subject of comments.

10.2 Victimising someone is a serious disciplinary offence and may lead to dismissal.

10.3 This protection applies even if a complaint is not upheld. The only exception is where someone deliberately makes an allegation they know to be false. That will be dealt with under our Disciplinary Policy.

11. CONFIDENTIALITY AND YOUR RIGHT TO SPEAK UP

11.1 We will keep reports and investigations as confidential as we reasonably can. Information will be shared only with those who need it to deal with the matter properly, or where the law requires it.

11.2 We ask everyone involved, including witnesses, not to discuss the matter with others while it is being dealt with. Deliberately breaching confidentiality, for example to spread gossip or to put pressure on a witness, may lead to disciplinary action.

11.3 Nothing in this policy prevents you from:

(a) reporting a crime to the police;

(b) making a protected disclosure (whistleblowing), including about sexual harassment;

(c) contacting a regulator or the Equality and Human Rights Commission;

(d) seeking advice or support from a lawyer, a trade union, ACAS, a medical professional or a support organisation; or

(e) bringing a claim in an employment tribunal.

11.4 Information about reports and investigations will be held in line with our Data Protection Policy.

12. HOW WE PREVENT HARASSMENT

12.1 Preventing harassment is better than dealing with it afterwards. We will:

(a) carry out a written harassment risk assessment, covering harassment by colleagues and by third parties, and review it at least once a year and after any significant incident or change in our business;

(b) train all staff on this policy when they join, with refresher training at least once a year;

(c) give managers additional training on preventing harassment, responding to reports and dealing with third parties;

(d) make this policy available to all staff [in the staff handbook / on the shared drive] and remind staff of it regularly;

(e) make clear to third parties that harassment of our staff will not be tolerated;

(f) include appropriate wording in our contracts and terms of business with customers, clients, suppliers and venues; and

(g) review our records of reports and the outcome of investigations to identify what more we can do.

12.2 We welcome suggestions about how we could better protect staff from harassment. Please raise them with your manager or the Senior Lead.

13. BREACHES OF THIS POLICY

13.1 Bullying, harassment and victimisation are disciplinary offences. Depending on how serious they are, they may be treated as gross misconduct and lead to dismissal without notice. For those who are not employees, they may lead to the end of their engagement with us.

13.2 Abuse of position, for example by a manager towards a junior colleague, will be treated as an aggravating factor, as will harassment of a customer, client or member of the public.

13.3 A manager who ignores harassment they know about, fails to report it or discourages someone from reporting it may face disciplinary action.

13.4 The action we may take against third parties is set out in section 5.

14. REVIEW OF THIS POLICY

14.1 The Senior Lead is responsible for this policy, which will be reviewed at least once a year. This policy was last reviewed on 09.11.2026