

## **1. ANTI-BULLYING AND HARASSMENT POLICY**

### **Company approach to bullying and harassment**

Bullying and harassment creates an intimidating and unpleasant atmosphere at work which affects an employee's health, safety and welfare and prevents employees contributing effectively to the organisation. The Roe Group incorporating Roe Bros & Co Ltd, North West Steel Ltd, all subsidiaries and affiliated companies takes any bullying and harassment seriously and will provide formal and informal methods for resolving the problems it creates. Prompt and appropriate action will be taken to deal with such behaviour. Complaints will be handled sensitively and employees will be protected against victimisation for making or being involved in a complaint.

Any employee who thinks they have been subjected to bullying and/or harassment during their employment can take action under this policy, or employees who witness behaviour falling under this policy are expected to report it. In either instance, his / her Manager / Depot Manager / HR Department will consider whether to take action under this policy.

Management are responsible for ensuring that all employees understand that bullying and harassment are not tolerated in the workplace and for taking early corrective action to deal with behaviour which may be offensive or intimidating.

Each employee has an obligation to promote an equal opportunity environment within the Company and observe and apply this Policy at all times. Violation of this policy is a serious offence and likely to be regarded as Gross Misconduct. If you are found to have harassed or bullied an employee(s) or condoned harassment or bullying or failed to observe confidentiality you could be the subject of disciplinary action and summarily dismissed.

## **Scope**

This policy applies to all of the Company's workforce, which includes full time and part time employees.

The Company takes all complaints of bullying and harassment very seriously and will endeavour to deal with each issue promptly, confidentially and adequately to ensure the continued smooth running of the business.

## **Confidentiality**

An accusation of bullying and/or harassment can be potentially defamatory, especially if confidentiality is not observed and a person's reputation is unfairly damaged. The Company therefore takes confidentiality very seriously. All documentation and details of bullying and harassment enquiries, allegations and grievances will be kept securely. Each employee of the Company has a duty to promote and abide by this Policy at all times.

## **Bullying**

The Company will not accept bullying or any form of unacceptable behaviour in the workplace. Everyone should be treated with dignity and respect at work. This policy is designed to prevent bullying and to deal with any cases that occur.

Examples of what is unacceptable behaviour, including what may be defined as bullying can be found below:

- Spreading malicious rumours, or insulting someone (particularly relating to characteristics protected from discrimination)
- Copying memos that are critical about someone to others who do not need to know
- Ridiculing or demeaning someone – be it a Manager / Supervisor or a fellow employee
- Exclusion or victimisation
- Unfair treatment
- Overbearing supervision or other misuse of power or position
- Unwelcome sexual advances – touching, standing too close, display of offensive materials

- Making threats or comments about job security without foundation
- Deliberately undermining a competent worker by overloading and constant criticism
- Preventing individuals progressing by intentionally blocking promotion or training opportunities
- Cyber bullying (See Company IT Policy in this handbook)

(This list is not exhaustive)

Bullying does not include:

- Occasional differences of opinion and non-aggressive conflicts and/or problems in working relations
- Being given reasonable instructions from your works foreman, Manager or Depot Manager
- Workplace counselling, managing employees under the Company capability / performance procedures and other actions in line with Company procedures

## **Harassment**

The Company wants to promote positive working relationships where all employees feel free to develop their abilities to the full. This Company is committed to achieving a working environment which is free from harassment.

Harassment is unwanted conduct that has the purpose, or effect, of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Harassment may be related to age, disability, gender re-assignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

Harassment also includes conduct of a sexual nature (sexual harassment) as well as treating someone less favourably because they have previously submitted or refused to submit to conduct of a sexual nature or conduct related to gender reassignment or sex.

A single incident can amount to harassment. Even if harassment does not fall into any of the categories above it is still unacceptable. Harassment can take many forms and can be physical, verbal or non-verbal conduct.

Harassment may include, for example:

- Racist, sexist, homophobic or ageist jokes or derogatory or stereotypical remarks about a particular ethnic group, religion, gender, sexual orientation or disability;
- Offensive or intimidating comments or gestures;
- Insensitive pranks or jokes;
- Unwelcome sexual advances or suggestive behaviour (whether or not the person making the advance or exhibiting the behaviour perceives the conduct as harmless);
- Unwanted physical conduct.

The examples above are not an exhaustive list.

A person may be harassed even if they are not the intended subject of the harassment. For example, a person may be harassed by racist comments about a different ethnic group if they create an offensive environment for that person.

Remember that what might be acceptable to one person may be upsetting and/or intimidating to another. A joke or prank, however innocent it seems, may be very offensive to someone else. Therefore:

- If you would not say it in front of your parents, partner or close friend of the same or opposite sex, don't say it, don't do it
- If you would not want your words or actions to be the subject of newspaper or television reporting, don't say it, don't do it
- If in doubt, don't say it, don't do it

### **Operational procedures – Informal action**

It is preferable for all concerned to try to resolve matters informally if at all possible. This is likely to produce solutions which are speedy, effective and restore relationships in the workforce. Sometimes people are not aware that their behaviour is unwelcome and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease.

Where an employee finds it difficult or embarrassing to raise the problem directly with the person creating the problem, a colleague can provide support. Alternatively, the complaint may be raised with their Manager / Depot Manager / HR department so that an informal solution can be achieved. Such approaches may be particularly helpful where the complaint is about the employee's direct supervisor.

The benefits of informal solutions should not discourage employees from using formal procedures where they prefer that option. Furthermore, there will be some instances where the seriousness of the complaint warrants formal action, and possibly criminal proceedings. Formal procedures may also be appropriate where a previous attempt at informal resolution has proved unsuccessful.

### **Operational procedures – Formal action**

If resolution at an informal stage has been unsuccessful or you feel the complaint is serious enough, the formal procedure may be used. The Company encourages the use of its grievance procedure to deal with issues in this instance. It should be noted however, that the Company encourages resolution at an early stage and therefore promotes the use of the informal procedure in the first instance wherever possible.

Details of the Company's grievance procedure can be found in the Employee Handbook.

### **Conciliation**

The Manager / Depot Manager/ HR department may arrange conciliation where, after discussions, both parties agree on an acceptable form of action.

### **Practice points**

Where a complaint arises in the course of a disciplinary, performance or grievance process, it will normally be dealt with under those particular proceedings.

Disciplinary action may be considered if a deliberately false allegation of bullying or harassment is made. However, such action will not be taken if a complaint which proves to be unfounded is judged to have been made in good faith.

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Please note:

- At all stages of the procedure the importance of confidentiality will be borne in mind. Attention will be given to considering what information needs to be shared and the way in which this is done.
- Wherever the words Manager or Depot Manager are used in this policy, they refer to Managers / Depot Managers who are designated by the Chairman and Directors to operate this policy.
- Managers / Depot Managers should seek advice from HR before investigation of a complaint.