

# **Bullying and Harassment**

**Policy and procedures**

**Aug 2025-27**

## Document control

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## Version History

Version	Date	Modified by	Notes of Changes
1	October 2024	Lisa Harrison	Policy implementation
2	August 2025	Hannah Lashley	Policy review and update
3	30 <sup>th</sup> September 2025	Robert Davis	Trustee Review and feedback.
4	4 <sup>th</sup> November 2025	Hannah Lashley	Policy changes aligned with employment law (Keely's) template

## Related documents

- Recruitment and Selection Policy
- Sexual and/or Harassment Policy
- Disciplinary and Grievances Policy
- Complaints policy

## Contents

<b>1. Purpose and Principle of policy and procedure .....</b>	<b>4</b>
<b>2. Bullying And Harassment .....</b>	<b>4</b>
<b>Definitions of Bullying.....</b>	<b>4</b>
<b>Definitions of Harassment .....</b>	<b>5</b>
<b>Examples of bullying or harassing behaviour include: .....</b>	<b>5</b>
<b>3. The Law explained .....</b>	<b>6</b>
<b>Senior Leadership Team and Trustee Responsibilities .....</b>	<b>6</b>
<b>4. Identifying Harassment and Bullying.....</b>	<b>6</b>
<b>Preventing Harassment and Bullying .....</b>	<b>7</b>
<b>Dealing with Harassment and Bullying .....</b>	<b>7</b>
<b>Procedure for Raising Concerns about Bullying or Harassment .....</b>	<b>8</b>
<b>Informal Resolution (aim to resolve within 5 working days) .....</b>	<b>8</b>
<b>Formal Complaint (acknowledge within 5 working days) .....</b>	<b>8</b>
<b>Investigation (completed within 10–20 working days) .....</b>	<b>8</b>
<b>Outcome (within 5 working days of investigation ending) .....</b>	<b>8</b>
<b>Appeal (within 10 working days of the outcome) .....</b>	<b>8</b>
<b>Confidentiality and Support.....</b>	<b>9</b>

## 1. Purpose and Principle of policy and procedure

The purpose of this policy is to protect anyone who is involved with Reaching Higher from harassment and bullying, and to ensure that we respond promptly, proportionately and sensitively to any concerns raised and treat these confidentially as far as possible.

### Applicability

This policy applies to all Reaching Higher trustees, staff, sessional workers and volunteers. It is to be brought to their attention on joining the charity and made readily available to anyone who may wish to read it.

We expect partner organisations to have the same robust approach in tackling harassment and bullying. We will not accept anyone being harassed or bullied by a partner, beneficiary or member of the public and will take appropriate action in such circumstances.

## 2. Bullying And Harassment

Bullying and harassment is behaviour that makes someone feel intimidated or offended. Harassment is unlawful under the Equality Act 2010 and is contrary to Reaching Higher's organisational values.

### Definitions of Bullying

Reaching Higher recognises bullying as a gradual wearing down process comprising a sustained form of psychological abuse that makes victims feel demeaned and inadequate.

Bullying is defined as offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, which has the purpose, or effect of intimidating, belittling and humiliating the recipient, leading to loss of self-esteem for the victim and ultimately self-questioning his or her worth in the workplace and society.

Workplace bullying can range from extreme forms such as violence and intimidation to less obvious actions, like deliberately ignoring someone at work. These can be split into two categories:

<b>The obvious...</b>	<ul style="list-style-type: none"> <li>• Shouting or swearing at people in public and private.</li> <li>• Persistent criticism.</li> <li>• Ignoring or deliberately excluding people.</li> <li>• Persecution through threats and instilling fear.</li> <li>• Spreading malicious rumours.</li> <li>• Constantly undervaluing effort.</li> <li>• Dispensing disciplinary action that is totally unjustified.</li> <li>• Spontaneous rages, often over trivial matters.</li> </ul>
<b>The less obvious...</b>	<ul style="list-style-type: none"> <li>• Withholding information or supplying incorrect information.</li> <li>• Deliberately sabotaging or impeding work performance.</li> <li>• Constantly changing targets.</li> <li>• Setting individuals up to fail by imposing impossible deadlines.</li> </ul>

	<ul style="list-style-type: none"> <li>• Levelling unfair criticism about performance the night before an employee goes on holiday.</li> <li>• Removing areas of responsibility and imposing menial tasks.</li> <li>• Blocking applications for holiday, promotion or training.</li> </ul>
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## Definitions of Harassment

<b>Physical Harassment</b>	<ul style="list-style-type: none"> <li>• Any unwanted touching (including at work social functions);</li> <li>• Threat of, or actual assault/ violence;</li> <li>• Potentially offensive gestures;</li> <li>• Sexual advances and requests for sexual activity;</li> <li>• Stalking.</li> </ul>
<b>Verbal Harassment</b>	<ul style="list-style-type: none"> <li>• Potentially offensive jokes or remarks;</li> <li>• Abusive, threatening or insulting words or behaviour;</li> <li>• Ridicule;</li> <li>• Lewd comments about appearance;</li> <li>• Threat of dismissal or loss of promotion;</li> <li>• Swearing.</li> </ul>
<b>Non Verbal Harassment</b>	<ul style="list-style-type: none"> <li>• Discriminatory or offensive e-mails, text messages, etc.;</li> <li>• Unfair work allocation;</li> <li>• Isolation, ignoring, deliberate exclusion;</li> <li>• Creation, circulation or publishing of visual displays of posters / banners / other written or pictorial materials of a sexual or racial context.</li> <li>• Coercion – pressure for sexual favours (e.g. to get a job or be promoted) and pressure to participate in political, religious or trade union groups, etc.</li> <li>• Isolation or non-cooperation and exclusion from social activities.</li> <li>• Intrusion – following, pestering, spying, etc.</li> </ul>

The actions listed must be viewed in terms of the distress they cause the individual. It is the perceptions of the recipient that determine whether any action or statement can be viewed as bullying.

Some of the above can be considered appropriate if there is a real business or performance reason which can be truly justified. For example, in some circumstances it is appropriate to supervise one individual more than others when a performance standard needs to be raised. The main considerations are whether the action can be justified and how it is perceived by the individual concerned.

## Examples of bullying or harassing behaviour include:

- Spreading malicious rumours.
- Unfair treatment.

- Picking on or regularly undermining someone.
- Denying someone's training or promotion opportunities.

Bullying and harassment can happen face-to-face or by letter, email and phone.

Behaviour that one individual may consider to be acceptable, another may not, so it is important that everyone is respectful of and sensitive to the needs and views of others. However, bullying does not include appropriate criticism of someone's behaviour or proper performance management.

*Sexual harassment is considered specifically in Reaching Higher's Sexual Harassment Policy.*

### **3. The Law explained**

Bullying itself is not against the law, but harassment is. This is when the unwanted behaviour is related to one of the following: age, sex, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief and sexual orientation.

## **Senior Leadership Team and Trustee Responsibilities**

**Reaching Higher's Senior Leadership staff and Trustees recognise that:**

- There is no place for bullying and harassment within, or by, charities.
- They have a responsibility to lead the charity and create a culture of openness and respect in which harassment and bullying will not be tolerated, and individuals feel confident in reporting any concerns.
- They have a central role to play to ensure the charity has clear policies, and allegations are handled promptly, sensitively, appropriately and in line with employment and other laws.
- They are responsible for ensuring they have processes in place to hear and address any concerns.

### **4. Identifying Harassment and Bullying**

Different things affect people all in different ways, and therefore what one individual might think of as harmless could be felt to be harassment and bullying by another. It is important to remember that harassment and bullying is defined by the way that someone feels about the behaviour itself, and not by the intentions. For example, someone may tell a joke that they think is funny. Although it was just a bit of fun and there was no intention to upset anyone, one of their colleagues finds it offensive. This individual may have a valid claim that they had been harassed and bullied.

For most people, the 'unwanted' aspect of actions, perceived as harassment', is a key distinction. Friendly, welcome and mutual actions are fine, but extreme care should be taken to distinguish between unwanted and accepted actions when interacting with others.

If sufficiently serious, one action alone can be termed as harassment however it is normally only termed harassment when it persists after the individual has asked the action to stop. As far as the Company is concerned any action that could be construed as harassment should not occur

and individuals do not need to make it clear that certain actions are unacceptable to them in advance. For example, it is certainly not necessary to let someone know in advance that touching in a sexual way is an unwanted action.

**It is important to remember that harassment:**

- Depends on the view of the individual on the receiving end of the behaviour;
- Does not depend on the severity of the behaviour - a joke or a throw-away comment could be perceived as harassment by anyone who hears it;
- Can include behaviour that is heard or seen, even if it indirectly.

## 5. Preventing Harassment and Bullying

**Everyone has a responsibility to discourage harassment and bullying and prevent it from taking place by:**

- Being aware of the problems which harassment and bullying can cause, and ensuring that personal behaviour does not cause others to feel harassed and bullied;
- Making colleagues aware that certain conduct or behaviour is causing concern or offence to others.

**Managers have a particular responsibility to prevent harassment and bullying taking place by:**

- Being alert to the possibility that harassment and bullying may be happening in their area;
- Using their judgement to correct behaviour that could be considered as offensive, and reminding employees of the Company's policy on this matter;
- Taking prompt action to stop harassment and bullying as soon as it is identified;
- Dealing with all incidents quickly, seriously, sensitively, and in confidence.

## 6. Dealing with Harassment and Bullying

Reaching Higher will deal with all complaints of harassment and bullying promptly, sensitively and in confidence. Most people who complain that they are being harassed and bullied simply want the behaviour to stop. Where appropriate, they can be encouraged to take charge of the situation themselves by informing the harasser that his/her behaviour is unacceptable and that it must stop.

If an employee feels unable to deal with a particular situation without support, s/he should ask the line manager or Human Resources to explain to the person causing offence that their behaviour is unwelcome and must stop.

If this initial approach fails to resolve the problem then the employee may use the formal Grievance Procedure. Disciplinary action will be considered in all cases where a claim of harassment or bullying is substantiated, and will be taken if the harassment or bullying, once identified, does not stop immediately.

## 7. Reporting Concerns

Those concerned about bullying or harassment are encouraged to take their concerns directly to their line manager or trustees whenever this is appropriate.

**ALL** concerns raised will be taken seriously (including anonymous, malicious disclosures). Reaching Higher will record any facts available or look in to further. Reaching Higher will be mindful that complaints of any kind could enact a formal procedure. Everyone involved in our work, even incidentally, has a right to complain and we will hold anyone accountable but, equally, individuals have a right to be protected from unsubstantiated and, potentially, malicious allegations. Consequently, anyone wishing to raise a concern is strongly encouraged to provide his or her contact details. This will also allow us to advise him or her of the outcome.

Serious actual or alleged incidents of bullying or harassment will be promptly reported to the Charity Commission using the serious incident reporting arrangements. Workers and volunteers can also make reports to the Charities Commission directly.

## 8. Procedure for Raising Concerns about Bullying or Harassment

### Informal Resolution (aim to resolve within 5 working days)

- If you feel able, speak directly to the person involved and ask them to stop the behaviour.
- If that's not appropriate, speak to your line manager or trustee for support.
- The aim is to resolve the issue quickly, confidentially, and informally.

If the issue isn't resolved or is too serious for an informal approach, move to the formal stage.

### Formal Complaint (acknowledge within 5 working days)

- Put your concern in writing to your line manager or, if they're involved, to a trustee.
- Describe what happened, when, and who was involved.
- Reaching Higher will confirm receipt of your complaint within 5 working days.

### Investigation (completed within 10–20 working days)

- An impartial person will investigate the complaint.
- They may interview those involved and review any evidence.
- You can be accompanied by a colleague or representative during any meetings.

### Outcome (within 5 working days of investigation ending)

- You'll be told in writing what the outcome is — whether the complaint is upheld or not.
- If bullying or harassment is found, the organisation will take appropriate action (for example, mediation, training, or disciplinary steps).

### Appeal (within 10 working days of the outcome)

- If you disagree with the outcome, you can appeal in writing within 10 working days.
- A trustee or senior manager not involved in the case will review it and make a final decision.

### **Confidentiality and Support**

- All concerns will be handled sensitively and in confidence.
- No one will be treated unfairly for raising a genuine concern.
- Support is available from your line manager, trustee, or external organisations such as ACAS.

## **9. Statutory Guidance**

[Gov.UK – Workplace Bullying & Harassment.](#)

[Charity Commission: Serious Incident Reporting.](#)

[Charity Commission: Report Serious Wrongdoing at A Charity as A Volunteer or Worker.](#)

[CC: Infographic; 10 actions trustees need to take.](#)

[CC: Safeguarding and Protecting People for Charities and Trustees.](#)