

Catch22 policy

Catch22 Workplace Harassment and Anti Bullying Policy

Contents

1. Policy Statement	2
2. Purpose	2
3. Scope	3
4. Definitions	3
What is Harassment	4
What is Bullying	4
What is Sexual Harassment	4
5. Responsibilities	5
6. Reporting and Investigation Procedures	6
7. Third Party Harassment	7
8. Protection Against Retaliation	8
9. Complaint raised in good faith not upheld	8
10. Withdrawal of a complaint	8
11. Training and Awareness	8
12. Review and Update	8
13. Contact Information	9
14. Legal Compliance	9
15. Related Policies	9
16. Annex 1: Equality Impact Assessment	10

Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	<i>People Team</i>
Queries to:	people.advice@catch-22.org.uk
Date created:	<i>October 2024</i>
Date of last review:	<i>October 2024</i>
Date of next review:	<i>October 2025</i>
Catch22 group, entity, hub:	<i>Catch22 Group</i>
4Policies level	<i>All Employees</i>

Document Version Control & Changes

Version	Last modified	By	Changes Made
<i>1.0</i>	<i>October 2024</i>	<i>People Team</i>	<i>Policy created</i>

1. Policy Statement

Catch22 takes a zero-tolerance approach to any form of bullying or harassment.

We know that experiencing inappropriate behaviour can have an emotional, physical and mental impact on our colleagues. This is not in line with Catch22 values. We will always take any allegation of bullying and harassment seriously and investigate these matters in line with Catch22 policies and procedures.

We all have a responsibility to create a culture where bullying and harassment doesn't happen. It is important that if we do see anything we have concerns about that we challenge it or report it using the appropriate channels; [I have a concern reporting form](#).

In the event that we discover that you've bullied, harassed or discriminated against someone, made false allegations, or treated a colleague badly because they've raised a legitimate concern, we regard this as potential gross misconduct and you may be dismissed under the [Disciplinary Policy](#).

2. Purpose

The purpose of this policy is to:

- Define harassment and bullying.
- Outline the responsibilities of employees and management.
- Outline how we expect our colleagues to behave
- Describe the procedures for reporting and addressing concerns.
- Outline what to do if you see or experience inappropriate behaviour
- Outline how we can all help to create a respectful working environment
- How to access impartial emotional support whether you are experiencing inappropriate behaviour, you have been accused or you are supporting a colleague

3. Scope

This policy applies to all employees, contractors, consultants, and temporary staff working for Catch22, both on and off company premises.

4. Definitions

- **Harassment:** Unwanted conduct related to a protected characteristic (Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual orientation) that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Examples of harassment at work could include (but are not limited to):

- Sexually suggestive jokes, comments or innuendo, offensive gestures or whistling
- Unnecessary touching
- Suggestions that sexual favours may further someone's career, or that refusing them may damage it
- Offensive remarks about a group's or an individual's race, ethnic or national origin
- Identifying a colleague as trans or non-binary without their permission
- Repeatedly using the wrong pronouns or name for someone who is trans or non-binary, despite having the correct information
- Ridicule or assumptions based on racial stereotypes
- Spreading rumours or gossip about someone's sexual orientation or gender

- Making jokes or offensive remarks about someone's disability
- Excluding someone because of their political opinion or religious group. This can be either In person or on social media or Instant messaging services such as WhatsApp

Harassment can include:

- A serious one-off incident
- Repeated behaviour
- Spoken or written words, imagery, graffiti, gestures, mimicry, jokes, pranks or physical behaviour that affects the person

It's still against the law even if the person being harassed does not ask for it to stop

- **Bullying:** Repeated, unreasonable behaviour directed at an individual or group that creates a risk to health and safety. This includes offensive, intimidating, or humiliating behaviour.
- **Sexual Harassment:** Any form of unwanted sexual advances, conduct, or behaviour that creates a hostile or intimidating environment. This includes but is not limited to inappropriate touching, suggestive comments, or unwelcome advances.

What is Harassment

Harassment is behaviour that makes someone feel intimidated or offended. Harassment is unlawful under the **Equality Act 2010**.

Examples of harassing behaviour include:

- Spreading malicious rumours
- Unfair treatment
- Picking on or regularly undermining someone
- Denying someone's training or promotion opportunities

Harassment can happen:

- Face-to-face
- By letter
- By email
- By phone

What Is Bullying

Workplace bullying occurs when an individual, or a group of individuals, repeatedly behaves unreasonably towards a worker, or a group of workers, and the behaviour creates a risk to health and safety. It includes both physical and psychological abuse.

Bullying behaviours can take many different forms, from the obvious (direct) to the more subtle (indirect).

Examples of bullying at work could include:

- someone has spread a malicious rumour about you
- your boss keeps giving you a heavier workload than everyone else
- someone keeps putting you down in meetings
- someone holding back information or deliberately "losing" information
- being excluded from team social events
- someone has put humiliating, offensive or threatening comments or photos on social media or Instant messaging services such as WhatsApp
- someone at the same or more junior level as you keeps undermining your authority

Bullying is not:

- Being held accountable for your performance or behaviour
- Constructive feedback
- Conflict or difference of opinions

Upward bullying

Upward bullying is when a colleague bullies a more senior colleague or manager. It can be from one colleague or a group of colleagues. Examples of upward bullying can include:

- showing continued disrespect
- refusing to complete tasks
- spreading rumours
- doing things to make you seem unskilled or unable to do your job properly

It can be difficult if you're in a senior role to realise you're experiencing bullying behaviour from your colleagues, however a senior position does not make you immune to the impact and effects of bullying and we would take any allegations just as seriously as any other.

What Is sexual harassment

The Worker Protection Act 2023 is an amendment of the 2010 Equality Act. It aims to better protect employees from sexual harassment by placing a legal duty on employers to actively prevent and address sexual harassment in the workplace.

Sexual harassment **involves unwanted behaviour of a sexual nature that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.**

The following are some examples of Sexual harassment:

- Requests for sexual favours, including implied or overt promises of preferential treatment or threats concerning present or future employment status;
- Offensive gestures or comments;
- Sexually-orientated jibes, innuendo or jokes;
- Unwanted physical contact;
- The display of sexually offensive visual material such as calendars, photographs, books or videos.

What some people might consider as joking, 'banter' or part of their workplace culture can still be sexual harassment.

Sexual harassment is usually directed at an individual, but it's not always the case. Sometimes there can be a culture of behaviour that's not specifically aimed at one person – such as sharing sexual images. Someone could still make a complaint of sexual harassment in this situation.

Sexual harassment may be experienced by men or women as a result of the conduct of men or women. It applies equally regardless of grade or level of job and may also occur when dealing with external clients, partner organisations and/or members of the public.

The above examples are not exhaustive. They are indicative of the type of behaviours that may constitute harassment, bullying and sexual which are unacceptable to the Catch22. If uncertain, employees should contact their direct supervisor.

5. Responsibilities

Employees: All employees are expected to treat each other with respect and to avoid any behaviour that could be considered harassment or bullying. Employees should report any incidents of harassment or bullying to their line manager, the People team or using the I have a concern reporting function.

Managers: Managers are responsible for setting a positive example and for addressing any reported incidents promptly and effectively. They must ensure that their teams are aware of this policy and that any concerns are taken seriously.

HR Department: The People team are responsible for providing support to individuals who report harassment or bullying. Investigations will be handled

impartiality and confidentiality and will ensure that appropriate actions are taken.

6. Reporting and Investigation Procedures

If you feel that you're being bullied, harassed, or discriminated against, it can sometimes be difficult to decide how you want to deal with it. It can help to talk this through with someone. We would always suggest that you speak to your line manager initially to talk things through or with another manager if you don't feel comfortable discussing your concerns with your line manager. Alternatively, you can speak to a member of the People team or raise your concerns through the company's confidential reporting system "I Have a Concern".

1. **Acknowledgement:** Upon receiving a report, the recipient (manager or HR representative) will acknowledge receipt of the complaint within 3 working days. An initial meeting may be scheduled with the complainant to discuss the complaint in detail and to outline the next appropriate action informal or formal proceedings depending on the seriousness of the allegation.
2. **Assessment and Preliminary Actions:**
 - Determine if the complaint falls within the policy's scope and whether immediate action is required to ensure the complainant's safety and well-being.
 - If necessary, interim measures (e.g., temporary work changes) will be implemented.
3. **Investigation:**
 - An impartial investigator, which may include HR, an external consultant, or a trained investigator, will be appointed based on the case.
 - Interviews will be conducted with all relevant parties.
 - Evidence, including emails or messages, will be collected, and confidentiality maintained.
4. **Outcome and Decision:**
 - A report summarising the findings will be prepared and shared with relevant parties, where appropriate.
 - An action plan, including possible disciplinary actions or support measures, will be implemented based on the findings.
5. **Communication:**

- Both the complainant and the alleged perpetrator will be informed of the outcome and any actions taken, with support offered to the complainant as necessary

6. Follow-Up:

- Ongoing support, such as counselling, may be offered, and the situation will be monitored.

7. Record-Keeping:

- Maintain detailed, confidential records of complaints, investigations, findings, and actions. Records will be stored in line with legal requirements and company policy for a specified duration.

8. Appeal Process:

- Both the complainant and the alleged perpetrator have the right to appeal the investigation's outcome if they believe it was flawed or decision unjust.

7. Third-Party Harassment

We do not tolerate any form of harassment including acts of harassment by a third party towards staff, including employees of partner organisations. In circumstances where a colleague believes they have been harassed by a third party such as a service user, contractor, supplier, partner or agency colleague and they wish to raise a complaint they should raise this as normal to their manager or via the "I Have a Concern" reporting system and we will take all necessary steps to bring this to the attention of the third party and warn them about their behaviour. In addition to bringing this to their attention in some circumstances we may also bar them from visiting our premises and where a criminal act is thought to have been committed, we will report them to the police.

If you experience or see inappropriate behaviour by customers or third-party contractors in your workplace, it's really important you don't feel like you just have to put up with it. Incidents of inappropriate behaviour should not be tolerated.

8. Protection Against Retaliation

Catch22 prohibits retaliation against anyone who reports harassment or bullying or participates in an investigation. Any form of retaliation will be treated as a serious violation of this policy and will result in disciplinary action.

9. Complaint raised in good faith not upheld

We encourage colleagues to raise complaints in good faith therefore, if a complaint is not upheld but they raised it in good faith, believing that it was true, then they will not face any disciplinary action. The colleague will only face disciplinary action if it is found that in addition to being false it was raised in bad faith (in that they knew or had reason to know that it was false).

10. Withdrawal of a complaint

If someone raises a complaint and later wishes to withdraw their complaint, or they ask that we don't take any action, we will, where possible, respect their wishes. In these circumstances we will still take steps to ensure that the matter is resolved, for example we may:

- Keep a record of the complaint and the request to keep it confidential
- Encourage people to resolve the issue informally, providing them with information and support on how they might do this
- Keep the situation under review, including checking in with them to determine if the situation had improved

If a complaint is considered serious or unresolved, we may need to investigate even if the complainant prefers otherwise. We'll inform them and ensure they aren't victimised during the process. This is to maintain a safe work environment and meet legal obligations.

11. Training and Awareness

All employees and managers will receive training to ensure awareness of this policy, including how to recognise and report harassment and bullying.

12. Review and Update

This policy will be reviewed annually and updated as necessary to ensure compliance with current legislation and best practices. Employees will be informed of any changes to this policy.

13. Contact Information

For any questions or to report harassment or bullying, please contact your line manager, the People Advice team or by using the confidential "I have a concern" reporting function.

14. Legal Compliance

This policy complies with the following UK legislation:

- Worker Protection (Amendment of Equality Act 2010) Bill
- Equality Act 2010

- Employment Rights Act 1996
- Health and Safety at Work Act 1974
- Protection from Harassment Act 1997

By following these steps, Catch22 ensures that complaints of harassment and bullying are handled fairly and effectively, supporting a positive and respectful workplace culture.

15. Related Policies

- Grievance Policy
- Catch22 Code of Conduct
- Complaints Policy
- Disciplinary Policy

Things to think about

Remember, you're responsible for your own behaviour while at work, any time you're representing Catch22 outside of the workplace or at any work-related event. We are all expected to be respectful and considerate of other people and individual differences - for more information, see [code of conduct policy](#).

Behaviour outside work

If you experience unwanted or offensive behaviour that happens outside of the workplace but still to do with your work, like at a work-related social event or training course, tell your manager, report it to the people team or use the I have a concern reporting function to outline the concerns. They'll investigate and deal with it in line with this policy.

Social media

If you put potentially offensive or inappropriate comments or images about or directed at colleagues or clients on social media sites, we'll take this very seriously and investigate it in line with the [social media policy](#)

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Workplace Harassment and Anti Bullying Policy
EIA completed by:	Claire Turner, Senior People Partner

Date of assessment:	31 October 2024
Assessment approved by:	Christina Duru, Chief People Officer

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	

Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.