



# Bullying & Harassment Policy

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## Policy Statement

Carmichael<sup>UK</sup> is committed to equal opportunity in employment, and to creating a harmonious working environment, which is free from harassment and bullying and in which every employee is treated, and will treat others, with respect and dignity. This commitment is driven and endorsed by the Directors of Carmichael<sup>UK</sup> and all employees who work with the company are expected to embrace our company ethos of 'placing people first' at all times.

Carmichael<sup>UK</sup> recognises that harassment or bullying can happen both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media. All employees of Carmichael<sup>UK</sup> are educated to understand and promote a workplace free of harassment and bullying. Part of the education process includes training all employees as Mental Health First Aiders to enable them to consider the perspective of others and the effects that the behaviour of an individual or group can have on others.

Additionally, Carmichael<sup>UK</sup> has appointed Celebrate champions throughout the company who are committed to ensuring that Carmichael<sup>UK</sup> and its employees do everything possible to ensure that we are a diverse and inclusive company and agency and as such bullying and harassment is not tolerated.

Where employees raise concerns about bullying and/or harassment, Carmichael<sup>UK</sup> provides a supportive environment to seek early resolution of these through an informal mechanism. Where this is not possible, Carmichael<sup>UK</sup> will take formal steps to address bullying and / or harassment in the workplace. Bullying and harassment may result in disciplinary action up to and including dismissal.

This policy is designed to protect employees and therefore all employees are expected to comply with it at all times.

## Policy Scope

This policy applies to all Carmichael<sup>UK</sup> employees. In addition, it applies to workers such as agency workers, casual workers, or consultants of the company (and reference to employees throughout the remainder of this policy extends to those individuals, as appropriate). This policy does not form part of any contract of employment or contract to provide services, and we may amend it at any time.



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The policy covers bullying and/or harassing behaviours from other employees as well as employees of other organisations, where these impact on the working environment. The behaviour can be by an individual or a group (mobbing). It can be face to face, verbally, written or via electronic methods (cyberbullying/cyber-harassment).

This policy is aligned to the Carmichael<sup>UK</sup> Equality, Diversity and Inclusion Policy, and the Carmichael<sup>UK</sup> Sexual Harassment Policy. These documents are located on the company's online HR software. These documents may be accessed at any time from any location by logging into the portal, accessing the document section of the software, and selecting HR policies.

## Policy Elements

### Definition of Bullying

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate, or injure the recipient (ACAS definition).

The following examples may constitute bullying and it should be noted that it is the impact of the behaviour which is relevant and not the motive or intent behind it: -

- threats, abuse, teasing, gossip, or practical jokes
- humiliation and ridicule either in private, at meetings or in front of customers/clients
- name calling, insults, devaluing with reference to age or physical appearance
- setting impossible deadlines and/or imposing excessive workloads
- making unjustified criticisms
- excessive monitoring
- removing responsibilities without appropriate reasons
- allocating menial or pointless tasks
- withholding information
- refusing requests for leave, holiday, or training

### Definition of Harassment

Harassment is unwanted conduct related to a relevant protected characteristic (age, disability, gender reassignment (including trans persons and gender identity), race, religion or belief, sex, or sexual orientation),



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which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Harassment may take many forms. It can range from extreme forms such as violence to less obvious actions such as persistently ignoring someone. The following, though not an exhaustive list, may constitute harassment: -

- physical contact ranging from touching to serious assault
- verbal and written harassment through jokes, offensive language, gossip and slander, or letters
- isolation or non-cooperation, or exclusion from social activities
- intrusion by pestering, spying, following etc

## Mechanisms for dealing with incidences of bullying and/or harassment

Carmichael<sup>UK</sup> is committed to dealing with cases of bullying and/or harassment promptly, sensitively and in confidence. There are two recognised channels for dealing with such cases which involve either an informal or formal mechanism.

Early resolution of cases may be assisted through an informal mechanism in which a supported discussion between two or more employees is facilitated by a manager or other third party. This is conducted in a fair and consistent manner to facilitate equal participation with a view to seeking resolution.

If use of the informal mechanism is considered inappropriate or fails to resolve issues bullying and/or harassment will be dealt with through the Carmichael<sup>UK</sup> disciplinary procedure. Where a single, serious incident and/or an ongoing pattern of bullying is identified, this may be considered gross misconduct. Cases of gross misconduct have the potential to result in dismissal.

## Process for dealing with incidences of bullying and/or harassment

If employees believe that they have been the subject of discrimination, harassment or bullying they may, in the first instance, ask the person responsible to stop the behaviour, as it is unacceptable. Speaking directly to the perpetrator at an early stage will often be sufficient to stop the behaviour. Employees should also report the incident to their Line Manager as soon as possible to enable the company to deal with the matter.

If an employee decides to make a formal complaint, they should do so through the grievance procedure set out in the Employee handbook/Site Worker Handbook (as applicable) as soon as possible after the incident has occurred. If there is no applicable grievance procedure please direct your complaint to HR. All complaints will be handled in a timely and



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confidential manner. All employees will be guaranteed a fair and impartial hearing and the matter will be investigated thoroughly. If the investigation reveals that an employee's complaint is valid, prompt attention and action will be taken, designed to stop the behaviour immediately and prevent its recurrence.

In such circumstances, if relocation proves necessary, every effort will be made to relocate the offending party rather than the victim, however, Carmichael<sup>UK</sup> will endeavour to relocate the victim where this is their preference.

All employees are protected from intimidation, victimisation or discrimination for filing a complaint or assisting in an investigation. Retaliating against an employee for complaining about harassment or bullying is a disciplinary offence and may constitute gross misconduct.

Whilst this procedure is designed to assist genuine victims of harassment or bullying, all employees should be aware that if they raise complaints which are proven to be deliberately vexatious, they may become subject to proceedings under the disciplinary procedure.

If the employee, contractor or temporary worker feels unable to raise the concern with their line manager or the recruiter, they should contact Human Resources using the following contact details:

**Name: Human Resources**

**Tel No: 01844 212058**

**Email: [HR@carmichaeluk.com](mailto:HR@carmichaeluk.com)**

**Address: CarmichaelUK, 34 Upper High Street, Thame, Oxfordshire OX9 2DN**

It is also possible to make an anonymous disclosure to the above contact. However, it should be noted that anonymous concerns are likely to be less effective and it will be more difficult to undertake an investigation based on information provided in this way.

## Reporting outcomes, confidentiality and record-keeping

Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.



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When appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again.

Information about a complaint by or about an employee may be placed on their personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection obligations and Privacy Policy.

## Responsibilities of Carmichael<sup>UK</sup>

Carmichael<sup>UK</sup> is responsible for the following: -

- ensuring that all employees are aware of the bullying and harassment policy
- publishing the bullying and harassment policy to enable all employees to access it
- updating the bullying and harassment policy annually and in line with new legislation/best practice
- providing training and education around bullying and/or harassment in the workplace
- creating an environment where employees are clear that bullying and/or harassment is unacceptable
- responding constructively and supportively where an employee raises a concern regarding bullying and/or harassing behaviours or is accused of such behaviours
- assessing the seriousness of the complaint and determining whether the matter should be addressed under early resolution
- assessing the risks arising from the parties continuing to work together while the concern is being addressed and consider alterations to working arrangements that would support this
- identifying suitable alternative placement(s) and appropriate support mechanisms to prevent isolation where it is not possible to keep the parties together
- considering referring to any support mechanisms to maintain health and wellbeing during the process
- treating all cases sensitively and in confidence



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## Responsibilities of Employees

All employees have a responsibility to help create and maintain a working environment that supports equal opportunities, opposes all forms of discrimination, including bullying and harassment, and respects the dignity of fellow employees.

Employees can contribute to eradicating bullying and/or harassment by:

- not discriminating against fellow employees, customers, clients, suppliers, or members of the public with whom you come into contact during the course of your duties
- not inducing or attempting to induce others to practice unlawful discrimination
- ensuring that their behaviour is beyond question and could not be considered in any way to be discrimination, harassment, or bullying
- discouraging such behaviour in others by making it clear that they find it unacceptable
- supporting colleagues if they are experiencing problems and are considering making a complaint
- reporting any discriminatory action to a member of the Human Resources Department



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## Approval & Review

This policy will be reviewed once a year to ensure continuing suitability with business requirements. As necessary additional alterations may be made from time to time in the light of legislative changes, operational procedures, or other prevailing circumstances.

All employees are encouraged to provide feedback and suggestions to improve this policy. All feedback and suggestions should be directed to the HR department who will forward suggestions to the Board.

This policy has been approved by the Board of Directors to ensure it is appropriate to the nature, scale, and purposes of the business.

**Signed:**

**Position:** CEO

**Date:** 03/03/2026

