



**WILLIAMSBURGH**  
HOUSING ASSOCIATION LTD

## **Anti Bullying and Harassment Policy**

### **Revision History**

<b>Creation Date</b>	<b>Reviewer(s)</b>	<b>Review Date</b>
November 2023	Corporate Services / Housing	November 2026

## Introduction

Williamsburgh Housing Association (WHA) are committed to providing a working environment free from bullying and harassment and ensuring all staff are treated, and treat others, with dignity and respect.

The aim of this policy is to help prevent the occurrence of bullying, harassment and/or victimisation in the workplace and to provide guidance on how to resolve complaints both informally and formally should such behaviour occur.

This policy covers bullying or harassment which occurs at work and out of the workplace, including social events, online and digital. It covers bullying and harassment by staff (which may include employees, management committee and agency workers) and also by third parties such as customers, stakeholders or contractors.

## What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- physical or psychological threats;
- persistent criticism;
- overbearing supervision;
- unjustifiably excluding colleagues from meetings;
- deliberately excluding colleagues from conversations;
- shouting or swearing at people in public and private;
- spontaneous rages, often over trivial matters;
- deliberately sabotaging or impeding work performance;
- setting individuals up to fail by imposing impossible deadlines;
- removing areas of responsibility and imposing menial tasks; and
- blocking applications for holiday, promotion or training without good reason.

This list is not exhaustive and other behaviour may constitute bullying.

## What is Harassment?

Harassment is any unwanted physical, verbal or non-verbal 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. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

Harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- offensive e-mails, text messages or social media content;
- mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

There are many actions and behaviours which do not amount to bullying and/or harassment, which include:

- Legitimate, reasonable and constructive criticism of an employee's performance or behaviour
- Reasonable instructions given to workers in the course of their employment
- A manager rejecting your personal request (such as a request for time off, working from home or adjusted hours) because of a legitimate business need.

## Responsibilities

You are required to respect others regardless of their characteristics and you must not behave in ways which may cause offence, or which in anyway could be considered bullying or harassment. You have a responsibility to help ensure everyone that you work with is treated with dignity and respect.

Where you feel you can, you should actively discourage harassment or bullying by making it clear you find such behaviour unacceptable. Where the behaviour is coming from an outside party – i.e. customer, contractor or external party advise them that the behaviour is not acceptable and ensure the behaviour is recorded on the system and/or highlighted to your manager for further appropriate action.

All staff have an obligation to tackle bullying or harassment in the workplace.

## How to raise a concern

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager or HR who can provide confidential advice and assistance in resolving the issue informally or formally. If

informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. The complaint will be handled with utmost sensitivity and details of the investigation will only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Suspension may be considered for either party where it is thought to be of benefit to either individual. Suspension does not imply that there has been any wrongdoing and will be fully paid for its duration.

Once the investigation is complete, we will inform you of our findings. If we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. You will not be told the details of sanctions imposed, however we will ensure that where action must be taken, it is of the appropriate level. If the harasser or bully is a third party such as a customer or stakeholder, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

You have the right to appeal our findings. To do so you should submit your appeal in writing to HR within five days of our findings being confirmed in writing.

### **Protection and support for those involved**

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

### **Record-keeping**

Information about a complaint by or about an employee will be placed on the employee's 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 data protection laws.

### **Review**

The Management Committee will have regard to this policy, as per our review schedule. As such, the policy will be considered every three years to ensure that it responds to any changing circumstances.