

Leadec Anti-Harassment Policy



Introduction

At Leadec, we strongly believe that everyone should be treated with respect and dignity, and we are committed to creating an inclusive culture and an environment of trust. We will not tolerate, allow or overlook any behaviours or actions which have a negative effect on working relationships.

We are fully committed to equality of treatment and have zero tolerance to harassment, sexual harassment, victimisation, discrimination and/or bullying of one individual to another whilst working for or on behalf of Leadec. We understand it can be difficult to raise concerns, however, please be assured that any complaints will be treated extremely seriously and will not be ignored, regardless of the role or position of those involved.

Our approach and practises are underpinned by our inclusive culture, policies, procedures and the Worker Protection (Amendment of Equality Act 2010) Act 2023, to ensure that harassment does not take place on the grounds of an individual's personal or protected characteristic(s).

Breaches of this Policy will be dealt with under the Company's Disciplinary Policy.

What is the aim of this Policy?

This Policy, in conjunction with the Dignity at Work (Bullying and Harassment) Policy, outlines our approach to harassment when working for Leadec.

The purpose is to:

- Make sure that everyone is aware that any form of harassment is unacceptable and will not be tolerated.
- Provide an understanding of what harassment is, including sexual harassment, and your role in developing a culture free from harassment.
- Ensure you understand how to raise concerns about harassment, including sexual harassment.
- Provide reassurance that any concerns will not be ignored but will be dealt with sensitively, appropriately and fairly.
- Explain what will happen should you make us aware that you have been subject to or witnessed harassment in the course of your work.
- Reinforce that any breach of this Policy will not be tolerated and will be dealt with extremely seriously and in line with the Company's Disciplinary Policy.

Who is this Policy for?

This Policy applies to all Leadec employees, as well as agency workers, consultants, self-employed contractors, casual workers, volunteers and interns.

If you are employed directly by Leadec, this Policy does not form part of your Contract of Employment and may be amended at any time.

What is Harassment?

Harassment can take many forms but generally it is seen as unwanted conduct or behaviour related to a protected characteristic that is intended to be, or has the effect of:

- Violating someone's dignity, or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

It is related to an individual's age, disability, gender reassignment, race, religion or belief, sex or sexual orientation. Although pregnancy and maternity, and marriage and civil partnership are not specifically protected under the legal provisions on harassment, we consider harassment on any grounds to be unacceptable.

A one-off incident can be classed as harassment if it is serious enough. Harassment can happen both inside and outside of work. For example, inappropriate comments to an employee on WhatsApp or social media when not at work.

Everyone is different and we recognise that some employees are more easily offended than others. Just because something does not or would not offend you does not mean that it is appropriate behaviour, and it may also offend someone else. If you are unsure if something is appropriate or not, do not do it or say it.

Harassment can occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not. Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic, for example, having a family member of a particular religion.

The law around harassment is clear – the motive or intention of the person harassing someone is irrelevant. This means that it makes no difference if you intended to offend someone or not, if the actions could reasonably be considered to have caused offence, then this is wrong.

What is Sexual Harassment?

Harassment may be sexual in nature and is prohibited under the Worker Protection (Amendment of Equality Act 2010) Act 2023. The law defines sexual harassment as:

- Conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- Less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Unwanted conduct that has one of these effects can be harassment even if the effect was not intended. A single one-off event or a series of incidents can amount to sexual harassment. A person can be affected by sexual harassment even if the conduct is not targeted at them.



It is also unlawful to treat someone less favourably because they have either submitted a complaint of sexual harassment or have rejected such behaviour.

What are some examples of sexual harassment?

Whilst this is not an exhaustive list, examples of unacceptable behaviours and unwanted conduct, include:

Physical contact

- Unwelcome physical contact including touching, patting, pinching, stroking, kissing, hugging.
- Fondling, or inappropriate touching.
- Physical violence, including sexual assault and rape.
- The use of job-related threats or rewards to solicit sexual favours.
- Using insulting or abusive gestures and physical threats.
- Continuously standing too close to somebody can make them feel uncomfortable or threatened.

Verbal

- Insulting or ridiculing someone.
- Propositions for sexual activity or favours which may advance an employee's career (or refusing which may damage it).
- Using abusive language, sexual comments or innuendo.
- Banter or mimicry
- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories, jokes or pranks.
- Repeated and unwanted social invitations for dates or physical intimacy.
- Condescending or paternalistic remarks.
- Sending or sharing sexually explicit messages or images (by any form such as text, what's app or via social media).
- Coercion.
- Gaslighting (which is used to describe a form of emotional abuse where one person gradually manipulates another in order to gain control. An example of this is using undermining behaviour to affect an employee's confidence by alleging that others have complained where in fact there is no evidence of a complaint).
- Making jokes or inappropriate remarks about someone, particularly in relation to someone's protected characteristic as defined by the Equality Act 2010.

Non-Verbal

- Sexually suggestive looks or gestures.
- Being uncomfortably close to someone.
- Displaying or circulating pornographic or other offensive material (e.g. racist or sexist material).
- Sending abusive or offensive emails or texts or making abusive comments on social media sites.
- Withholding information to make someone less effective at work and removing areas of responsibility without a good reason.

- Graffiti.
- Acts affecting a person's surroundings.
- Facial expressions.
- Whistling.
- Leering.
- Predatory behaviour, for example, being cornered in isolated areas or a locked room and inappropriate behaviour taking place with no witnesses.

The effect of such behaviour and whether it is unwanted will be considered from the point of view of the person who feels harassed, also known as the "recipient". Therefore, even if you did not intend to cause offence, if your actions could be considered to reasonably cause offence, this would amount to harassment.

Who is likely to experience sexual harassment?

Anyone working for or on behalf of Leadec can be subject to sexual harassment. It does not just happen to women and may also occur between people of the same sex. Sexual harassment can often occur within unequal relationships in the workplace, for example, a supervisor or manager may sexually harass an operative, or a long serving employee may sexually harass a new agency worker. Please be assured, we will believe you and do not tolerate any sexual harassment at Leadec. We encourage you to raise any concerns.

When does this Policy apply?

This Policy does not just apply when you are at your place of work undertaking work on behalf of Leadec: it applies throughout your employment. Harassment can occur in many forms, and can take place either at work, outside of work, in person, or online. For example, if you send unwanted and inappropriate text messages of a sexual nature to a colleague when you are not at work.

Therefore, if you believe you have experienced harassment from another person who is employed or undertakes work for or on behalf of Leadec or our customer, this Policy will apply, and we would encourage you to raise your concerns to us.

What are the responsibilities of line managers?

At Leadec, our management team have specific responsibilities in ensuring we create an environment at work that is free from harassment. Line managers must:

- Ensure that your direct reports understand what sexual harassment is, that it will not be tolerated and how concerns can be reported to us.
- Set an example by ensuring that your own behaviour and conduct respects the dignity of others, ensuring you always comply with this Policy.
- Challenge unacceptable behaviour, by taking immediate and corrective action if you witness acts of harassment whether they are formally raised or not, bringing this to the attention to the individual concerned, to a more senior manager or to the HR Department.
- Remember that behaviour you may not find offensive or unwanted, may have a very different effect on someone else.



- Be familiar with the way complaints involving harassment are to be handled informally or via the formal Grievance Policy.
- Seek guidance from your line manager or the HR Department if you need support in understanding this Policy.

Where a complaint of harassment, including sexual harassment is received, line managers must:

- Discuss this with your HR Business Partner immediately, to ensure the complaint is managed appropriately.
- Always keep an open mind and not let your views influence a situation or dismiss a concern. For example, if you get on well with the person accused of harassment, or believe they are a decent person, this should not influence how you manage the situation.
- Not doubt a harassment complaint, including sexual harassment complaint, simply because it happened outside of work or nobody else witnessed it.
- Not ignore or cover up a harassment complaint.
- Provide support and protect individuals who make a complaint of harassment, as well as those who witness any harassment, focusing on their wellbeing, through support via Occupational Health and/or the Employee Assistance Programme (EAP).
- Manage any complaints fairly, without delay, sensitively and with due regard to confidentiality.
- Co-operate during any investigation by providing fair and accurate information where a complaint regarding harassment has been made.

What are the responsibilities of employees or those working for and on behalf of Leadec?

You have a responsibility to contribute to a respectful and productive working environment. This includes being kind, supportive and treating colleagues, customers and site visitors with dignity and respect. You have a duty to assist in the creation of a safe working environment, where harassment is not tolerated. You must:

- Ensure you understand what harassment is. You must ask your line manager to explain this to you if you are unsure.
- Be aware of how your behaviour may affect others.
- Challenge unacceptable behaviour in a professional manner, wherever possible and if it is safe to do so.
- Report incidents of harassment, including sexual harassment, when witnessed and/or support an individual in raising this to the management team, HR Department, or via Safecall.
- Participate fully in any investigation process when a complaint has been made in relation harassment.

You are expected to follow this Policy throughout your employment with Leadec. We will communicate this Policy to you on a regular basis using a variety of methods including when you join us, during any training you receive, via team briefings, departmental meetings and any internal communication, such as the Company newsletter.

What should I do if I believe I am being harassed?

The informal approach

You may feel able to approach the person yourself, or with the help of someone else at Leadec, such as a colleague. The person may not know that their behaviour is unwanted or upsetting and the impact this is having on you. You should tell the person concerned what behaviour or conduct you find offensive and unwelcome and say that you would like it to stop immediately – be firm, clear and stick to the facts. You may wish to make a note for your own records.

If your concern involves a manager, it may be more appropriate to speak to another manager or to the HR department to discuss your concerns.

Please be advised that if we become aware that harassment is taking or has taken place, we may decide to manage this through a formal process rather than an informal process. This may happen if we believe the concerns are so serious that they cannot be dealt with informally.

The formal approach

If an informal approach is not appropriate, for example, because the unwanted conduct is so serious, or you have tried to resolve this informally but remain unhappy, you can make a formal complaint in line with the Company's Grievance Policy. We would encourage you to speak to your line manager as soon as possible about your concerns. In the case of a complaint about harassment, the normal grievance procedure will apply, unless we consider that an alternative policy is more appropriate. In some circumstances, we may appoint an independent manager to investigate your complaint.

If you want to raise a grievance you should do this in writing, this can be done via email (text/instant messaging or via social media is not acceptable) and your letter/email should be as detailed as possible. Please be prepared to describe what happened in detail. We recognise you may find this uncomfortable and embarrassing, however please be assured our managers have been trained on investigating harassment complaints and will understand that this is difficult for you.

It is also helpful to set out what you would like the grievance outcome to be.

If, however, you struggle to read and understand and need help in raising your complaint, then please contact the HR Department to discuss your concerns.

All complaints will be treated in a confidential, timely, impartial and sensitive manner. Your grievance will be investigated seriously and promptly, in line with the appropriate policy. We will commence investigations as soon as possible and conclude as soon as we can within a reasonable time frame to allow the most thorough investigation possible. If there are any delays to the process, these will be justifiable and communicated to you at the appropriate time.



What if I do not feel comfortable raising concerns that I am being harassed to my manager?

We understand that raising complaints related to harassment, including sexual harassment, can feel particularly distressing or daunting. Harassment, of any kind is not acceptable and we want you to feel that you are able to speak up and raise this as an issue.

If you do not wish to raise your concerns with your line manager, you can speak to your Site Contract Manager, Functional Head, Regional General Manager or a member of the HR Team. You can contact the HR Department on 01926 623 550 option 2.

Alternatively, we understand that you may not feel comfortable raising your concerns directly with Leadec and that you may wish to remain anonymous. In such situations, we encourage you to contact Safecall. They are an independent, confidential reporting service and they can be contacted 24/7, 365 days a year as follows:

- Online at: www.safecall.co.uk/report (you can scan this QR code to make a report).
- Via a free phone number: 0800 915 1571.



Calls are handled by skilled staff who are not employed by Leadec and will be treated in the strictest confidence. All reports made via Safecall will be sent to the Compliance Officer. Safecall will not disclose your name to Leadec if you wish to remain anonymous. Online reports are via a portal that will allow you to re-login and check the progress of your report and allows the person investigating the complaint to ask follow-up questions to help them with their investigation without them ever knowing who they are talking to. Where you ask to remain anonymous, no personal details are shared with us via the portal.

Please be assured that if you have requested anonymity, Safecall will not share any of your personal details with Leadec, or our Compliance Officer.

What should I do if I have witnessed harassment?

You do not have to be the recipient or target of harassment (including sexual harassment) to raise a concern or make a complaint. If you witness inappropriate behaviour or unwanted conduct or become aware of it, we encourage you to report this to the management team, provided it is safe to do so, and you feel able to do so. Alternatively, you can raise your concerns to your Site Contract Manager, to the HR Team or via Safecall (the details are in the above section in this Policy).

We understand that you may feel uncomfortable reporting harassment, but it is important that we are made aware of this, and your actions are important in helping us to create a culture free from harassment. **Tackling harassment is everybody's responsibility.**

What happens if it is determined that I have been harassed?

The wellbeing of those working for Leadec is our priority and we will provide you with support throughout this process. If, following a formal investigation, it has been determined that you have been harassed at work, we will discuss with you the available support to assist you at work. We may refer you to Occupational Health, or consider additional support, which may include but is not limited to our Employee Assistance Programme.

Please be assured, we treat any complaints of harassment (including sexual harassment) extremely seriously and appropriate action will be taken against the person that has harassed you in line with our Disciplinary Policy, up to and including summary dismissal. For those who do not work for Leadec, we will take appropriate action.

What happens if I am accused of harassment?

All complaints will be treated seriously, which may mean that adjustments are put in place to limit any contact with certain individuals or where there is no alternative option, we may suspend you from work on full pay, pending an investigation.

During the investigation, you will have a dedicated point of contact, which may be your line manager, or an independent manager who we consider is suitable to support you during this time. We will discuss with you available wellbeing support, which may include, but is not limited to, an Occupational Health referral or signposting to the Employee Assistance Programme.

If, following an investigation, you are found to have committed an act of harassment, this will be dealt with in line with the Company's Disciplinary Policy, which may lead to disciplinary action being taken against you, up to and including summary dismissal. For those who do not work for Leadec, we will take appropriate action.

What happens if my manager knows I am being harassed and has not done anything?

We expect our supervisors and managers to challenge inappropriate behaviour and take corrective action if they witness acts of harassment whether they are formally raised or not. Managers are aware that it is not acceptable to allow inappropriate behaviour or unwanted conduct to take place at Leadec. We will undertake a formal investigation and where a supervisor or manager is found to have authorised, allowed or overlooked harassment, we will take appropriate action in line with our Disciplinary Policy.

What if the person harassing me is not employed by Leadec?

The harassment of anyone working for or on behalf of Leadec is unacceptable and will not be tolerated. You must still make us aware if you are being harassed by someone that does not work for Leadec, which includes customers, suppliers, clients or visitors to our premises. This is known as 'third party' harassment. Any instance of sexual harassment which occurs during your employment with Leadec should be reported in line with this Policy, regardless of who the person is harassing you.



Can I withdraw a complaint I have made?

If you wish to withdraw a complaint you can, however, please be aware that in some circumstances, we may not be able to ignore the allegations which have been made due to the seriousness of the nature of the complaint. In this circumstance we may still believe that it is necessary to continue to investigate to ensure we uphold our responsibility to provide a safe working environment.

What if someone makes a false claim?

All complaints will be presumed to have been made in good faith and you will not be subject to any detrimental treatment or victimisation, by raising a complaint or assisting with an investigation if you believe this to have taken place. If we find that an individual has been subject to unfair treatment as a result of raising a concern, we will take appropriate action. Occasionally, once an investigation has taken place it may be decided that a malicious or false complaint has been made. Where this is the case, any individual found to have made such a complaint may be subjected to disciplinary action.

What if I am in a consensual relationship with another employee?

If you are in a personal relationship with someone who works for Leadec, then you must comply with the Personal Relationships at Work (Nepotism) Policy, completing the Employee Declaration Form and informing your Site Contract Manager, Regional General Manager or Functional Head. If you are a salaried employee, this will be discussed with the Regional General Manager and also the Board of Management and appropriate steps will be put in place to minimise any risk to the business.

However, engaging in consensual sexual acts in the workplace is unacceptable and we do not permit sexual contact in the workplace. Any such behaviour will be addressed in line with the Disciplinary Policy. We recognise that if this behaviour were allowed to take place, there is a risk of one party believing that the conduct is acceptable and the other considering the conduct to be unwanted, either at the time or in hindsight. This can increase the risk of sexual harassment and is therefore not permitted.

Is there any other support available?

There are several independent, external organisations who can support you during this difficult time. They are:

<p>Employee Assistance Programme Free confidential advice for you and your family. 0800 389 0285 https://wisdom.healthassured.org (Organisation Code: Metlife - Leadec)</p>	<p>Citizens Advice Free confidential and impartial advice 03444 111 444 www.citizensadvice.org.uk</p>
--	--

<p>Victim Support Support for victims and survivors of abuse. 0808 1689 111 www.victimsupport.org.uk</p>	<p>Samaritans 24-hour emotional support for anyone who needs to talk. tel:116 123 www.samaritans.org</p>
---	---

Policy Owner

The HR team are responsible for ensuring that this Policy is kept up to date and reflects current legislation, analysing data around allegations of harassment on an ongoing basis to assess the impact of this Policy and whether additional training or communication is required.

The HR team will support line managers in providing coaching and training to carry out any investigation, disciplinary and/or grievance processes, ensuring that all complaints are dealt with in a confidential and sensitive manner. If you are a manager and feel you require additional harassment training, please do not hesitate to contact the HR Department.

Revision and Status

Any harassment complaints disclosed will be placed on your personnel file along with a record of any decisions taken and any notes compiled during the process. Please be assured this information will be treated in the strictest confidence on a need-to-know basis and will be processed in accordance with our HR Data Retention and Data Protection Policies. This information will be held in line with General Data Protection Regulations (GDPR).

Issue No.	Page No.	Date Issued	Changes Made	Amended By
1	N/A	December 2024	New Policy	Nehal Lakhani, HRBP

