

Anti-Bullying and Harassment Policy

1. Introduction

Morson Group believe that everyone should be treated and treat others with dignity and respect at work. Bullying and harassment of any kind, including sexual harassment, will not be tolerated within the Group by colleagues working either on or off site nor by third parties such as customers, suppliers or visitors to our premises. Any such allegations will be treated seriously and dealt with promptly. Any proven incidents of bullying or harassment or discriminatory practices will be dealt with as a disciplinary offence and will be managed in line with the Company Disciplinary Policy.

In order to support a collaborative and caring working environment, the Company has signed up to the 'RESPECT' values:

- Recognise that we are all different
- Eliminate inappropriate language & behaviour
- Share best practise and ideas
- Put the Morson values into practice
- Earn respect from others
- Communicate with colleagues in person rather than email (when appropriate)
- Treat everyone with respect

2. Scope

The policy covers all individuals employed by Morson Group as well as those engaged with the Group in the capacity of consultants, contractors, casual and agency staff including those supplied to work for Morson Group clients (hereafter referred to as "colleagues").

This policy does not form part of employees' contracts of employment or other terms of engagement. We may vary this policy at any time.

3. Definitions

Bullying

Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power, through means that undermine, humiliate, denigrate or injure the recipient.

Harassment

Unwanted conduct related to a relevant protected characteristic, with the purpose or effect of violating another person's dignity or creating an intimidating, hostile, degrading humiliating or offensive environment.

Protected Characteristics

Protected characteristics are defined by the Equality Act 2010 and include; age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Sexual Harassment

Unwanted physical, verbal or non-verbal conduct of a sexual nature 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 act can amount to sexual harassment and the conduct does not need to be sexually motivated, only sexual in nature, nor does someone need to object first before conduct can be described as unwanted.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature.

Sexual harassment may include for example:

- Unwanted physical conduct or “horseplay”, including touching, pinching, pushing and grabbing.
- Making sexual comments or jokes
- Sending or displaying material that is pornographic or that some people may find offensive

A person may be sexually harassed even if they are not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague’s computer in the workplace.

Unacceptable behaviour

The following are examples of unacceptable behaviour which may be demonstrated via face-to-face contact, written communication or by phone or via other forms of digital communication.

- Spreading malicious rumours or insulting someone
- Copying memos that are critical about someone to others who do not need to know
- Ridiculing or demeaning someone through jokes, offensive language, gossip or slander either in private or public
- Exclusion, isolation or victimisation
- Unfair treatment
- Overbearing supervision or issue of power
- Unwelcome sexual advances
- Making threats or comments about job security without foundation
- Deliberately undermining a competent worker by work overload and/or constant criticism
- Preventing individuals from progressing by intentionally blocking promotion or training opportunities
- Physical contact ranging from touching to serious assault
- Excessive monitoring
- Imposing excessive workloads
- Sexual Harassment
- This list is not exhaustive.

4. Reacting to Allegations of Bullying and Harassment

If you are engaged as a consultant, contractor, casual or agency worker, the procedures under this section may vary and will depend on your working environment. If you are raising a complaint or are involved in any complaint process, you will be advised of the procedure that will be followed.

Attempts should be made to resolve any concerns regarding behaviour that might constitute bullying or harassment informally in the first instance. This can be done by raising concerns with your line manager or the HR department.

Should an informal resolution not be possible or inappropriate you should raise a formal complaint in writing to the HR Team.

Your written complaint should include details of the allegations including the name of the individual, the nature of the conduct, the date and time, the names of witnesses and any attempts you have taken to prevent the conduct so far.

In line with the Grievance Procedure, a thorough, independent, impartial and objective investigation will be

carried out. This will involve interviews with the person against whom you have made the complaint and any other relevant witnesses. The investigation will be carried out quickly, sensitively and with due respect for the rights of all parties.

Consideration will be given to the separation of parties as necessary, or other necessary changes to working arrangements during the investigation.

The individual against whom the complaint has been made will be given full details of the nature of the complaint and a full opportunity to respond. The investigation may require interviews with other people and consideration of documents.

All parties will have the right to be accompanied by a work colleague or trade union representative. Confidentiality will be maintained throughout the investigation. The names of all involved parties will only be disclosed on a need-to-know basis to those individuals involved in the investigation. When the investigation has been concluded, a recommendation will be made. This will include whether or not your allegation is considered to be well founded.

If the allegation is determined to be well founded, disciplinary action may be taken against the alleged harasser or bully in line with the Disciplinary Procedure. Bullying and/or harassment is sufficiently serious to potentially amount to gross misconduct for which summary dismissal is justified. Other sanctions may include the transfer to a different role, or required to remain away from their normal office. Regardless of whether or not a complaint is upheld, other considerations may include mediation or counselling or a change of reporting duties between the parties.

All colleagues have a duty to co-operate fully in this process. As a general principle, the decision to progress a complaint is up to you however we do have a duty to protect all colleagues and we may pursue the matter independently if, in the circumstances, it is appropriate to do so.

If you are not satisfied with the outcome of the complaint, then you have the right to appeal the decision. Any appeal should be made in writing within ten working days of being notified of the outcome to the nominated individual. Full written grounds should be provided.

You will be invited to attend a meeting to discuss your appeal. You will be notified of the outcome of your appeal as soon as reasonably practicable after this meeting. The appeal stage represents the final stage of this procedure. You have the right to be accompanied by a trade union representative or a Morson Group colleague at this meeting.

5. Witnessing Harassment

Colleagues who witness harassment are encouraged to take appropriate steps to address it. This could include:

- intervening (where appropriate to do so)
- supporting the victim to report it or reporting it on their behalf,
- reporting the incident where you feel there may be a continuing risk if you do not report it
- co-operating in any investigation into the incident

Witnesses will be provided with appropriate support and protected from victimisation.

6. Third Party Harassment

Third-party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, unwelcome sexual advances from a client, customer or supplier visiting the employer's premises or where a person is visiting a client, customer or supplier's premises in the course of their employment.

Third-party harassment will not be tolerated.

All colleagues are encouraged to report any third-party harassment they are a victim of or witness to.

Any sexual harassment by a colleague against a third party may lead to disciplinary action in accordance with our disciplinary policy or other formal action depending upon the employment status of the colleague involved.

We take active steps to try to prevent third-party sexual harassment of colleagues. We will liaise with our clients to set out our approach and to work with them to ensure this is enforced in working environments where our contractors are supplied.

Should third-party harassment of colleagues occur, we will take steps to remedy any complaints and to prevent it happening again. This will be dealt with on a case-by-case basis but may include banning the third party from our premises and reporting criminal acts to the police.

7. Confidentiality

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.

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 a colleague may be placed on their personnel file, along with a record of the outcome and of any notes or other documents compiled with during the process. These will be processed in accordance with our Data Protection Policy.

8. Monitoring

We will monitor the treatment and outcomes of any complaints of harassment or victimisation to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved, and workforce training is targeted where needed.

9. Protection and Support

Colleagues who report harassment, who have witnessed harassment, or who have participated in good faith in any related investigation must not suffer any form of retaliation or victimisation as a result. Any colleagues found to have retaliated against or victimised against someone in this way will be subject to disciplinary action under our Disciplinary Procedure or other formal action depending upon their employment status.

If you believe you have suffered any such treatment, you should follow the same steps as detailed under section 4 of this policy.

We offer access to confidential counselling for anyone affected by or accused of sexual harassment. This is available on a self-service basis to those colleagues that have access to the Hive. Alternatively, you can request this from hadmin@morson.com

Support and guidance can also be obtained from the following external services (this is not an exhaustive list):

- a) The Equality Advisory and Support Service: www.equalityadvisoryservice.com
- b) Protect: www.protect-advice.co.uk
- c) Victim support: www.victimsupport.org.uk
- d) Rape crisis: www.rapecrisis.org.uk
- e) Rights of women (England and Wales): www.rightsofwomen.org.uk
- f) Scottish Women's Rights Centre (Scotland): www.scottishwomensrightscetnre.org.uk

10. Responsibilities

The Executive Board and Group HR Director have overall responsibility for the effective operation of this policy. Day to day operational responsibilities, including regular review of this policy has been delegated to the HR department.

Managers

Managers are responsible for:

- Ensuring that harassment or bullying does not occur within the departments, teams, and areas for which they are responsible.
- Ensuring that direct reports are aware of and understand this policy and their responsibilities.
- Positively promoting a working environment that corresponds with the RESPECT values.
- Reacting swiftly to any complaints of bullying or harassment by colleagues, supporting them through the informal and/or external channels outlined in section 4.
- Always maintaining confidentiality.

Colleagues

All colleagues are responsible for:

- Helping to create and maintain a working environment that respects the dignity of their colleagues and all other parties who engage with the Morson Group.
- Discouraging and reporting all forms of unacceptable and inappropriate behaviour.
- Proactively incorporating the RESPECT values into their workplace behaviour.
- To support and encourage colleagues experiencing or witnessing bullying or harassment to raise concerns through the appropriate channels, signposting them to their line manager and/or the HR department.

The HR department

The HR department are responsible for:

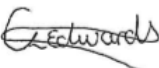
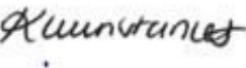
- Ensuring that all complaints of bullying or harassment are dealt with promptly, seriously, confidentially and in accordance with the appropriate procedures.
- Providing appropriate training on bullying and harassment, where necessary.

11. Amendment Record

Issue	Amendments	Date	Issued By
13	Section 4, line added about requirement to remain away from their normal office.	August 2024	Becky Hicks Katie Hancock

	Rebranded. Refer to v.12 for old amendment record.		
14	Scope amended. Sexual Harassment added to Definitions. Section 4 enhanced. New sections added: Witnessing Harassment, Third Party Harassment, Confidentiality, Monitoring, Protection and Support. Minor amendments made to Responsibilities – Colleagues.	January 2025	Katie Winstanley
14	Reviewed – no change.	September 2025	Chloe Edwards
15	Rebrand	December 2025	Katie Hancock

12.Document Control

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MG Approval	Gareth Morris		09/09/2025