



BULLYING & HARASSMENT POLICY 2025

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1. SCOPE

This policy exists to guide and reassure all employees when making or dealing with complaints of bullying and harassment.

2. RESPONSIBILITIES

This policy applies to all employees. Persons not employed by Greenway Training Ltd but who are engaged to carry out work for Greenway Training Ltd, such as agency staff/contractors, are required to observe the terms of this policy.

Persons not employed by Greenway Training Ltd but who are engaged to carry out work for Greenway Training Ltd, such as agency staff, contractors, are also required to follow this procedure.

3. PREVENTION OF BULLYING AND HARASSMENT

- 3.1** Greenway Training Ltd is committed to creating and maintaining a working environment where all employees are treated with dignity and respect and are never subjected to any form of bullying or harassment.
- 3.2** Bullying or harassment is behaviour towards another person which is offensive and causes that person to feel demeaned and distressed. It is not the intention of the perpetrator that is key in deciding whether bullying or harassment has occurred, but whether the behaviour is unacceptable by reasonable, normal standards and is unwelcome to the person/people subjected to it. Such behaviour or intended behaviour in the workplace can create a working environment in which individuals are intimidated and unable to give their best.
- 3.3** A person may be subjected to bullying or harassment on account of his/her age, gender, sexual orientation, race, disability, religion, philosophical belief, nationality or any individual characteristic or attribute. Bullying or harassment may occur as an isolated incident or may take the form of persistent persecution of an individual or individuals.

4. PRINCIPLES

- Greenway Training Ltd responsible for HR function has overall responsibility for ensuring the policy is implemented and for monitoring its effectiveness
- All employees have an individual responsibility to ensure the policy is implemented effectively and that they help to create a working environment in which all persons are valued and treated with respect
- Greenway Training Ltd promote and recognises positive behaviours and will not tolerate negative and unacceptable behaviours

- All employees will value and respect the rights of others and will refrain from:
 - Behaviour that another person may find offensive and unwelcome
 - Unwanted physical contact with another individual, such as any form of sexual advance or unwelcome touching
 - Verbal remarks others may find distressing, such as those of a sexual nature, racist comments, offensive observations about disability, derogatory name calling, malicious rumours, threats, intrusive personal questions or unpleasant comments about another person's characteristics and attributes
 - Display, storage or dissemination of written or pictorial material that others might find offensive or would be demeaning or cause distress
 - Abuse of power through intimidation of others
 - Discrimination towards others because of their culture, age, disability, ethnicity, gender, religion, philosophical belief, sexual orientation, or personal attributes
 - Insensitive jokes and pranks that cause offence
 - Abusive comments about the appearance and characteristics of others
 - Incitement of other persons to engage in any form of bullying or harassment.

- All employees will respect the rights of others and will treat each other with dignity and respect and positive behaviours include:
 - Knowing and understanding each other well enough to recognise what we, as individuals, deem to be unacceptable behaviour
 - Being aware of our own behaviour and always consider the effect it may have on others
 - Working together and respecting one another's beliefs and preferences
 - communicating openly, effectively and constructively when mutually agreeing expectations
 - Everyone accepting personal responsibility for their behaviour and actions
 - Each personally creating a climate where we can share our feelings and provide feedback to one another in a constructive and meaningful way allowing us to tackle bullying or other conflict at work informally and quickly wherever possible
 - Openly challenging unacceptable behaviour and prejudiced attitudes without any fear of repercussions
 - Believing that appropriate action will be taken.

- All employees have an obligation to:
 - Create a positive working environment where no one is bullied or harassed
 - Do all they can to prevent bullying/harassment
 - Report incidence of particularly serious or persistent bullying to Greenway Training Ltd (even though the person bullied may not have made any complaint)
 - Help and support any person who has been subjected to bullying/harassment.

- Any employee who harasses another person is in breach of Greenway Training Ltd Equality and Diversity policy may be judged to have engaged in gross misconduct and is therefore liable to dismissal
- An employee may be accompanied by a colleague, family member or a trade union representative when raising a complaint about being bullied or harassed
- All complaints relating to bullying and harassment will be dealt with fairly, sensitively and confidentially
- Greenway Training Ltd will protect any employee who raises a complaint about bullying or harassment from subsequent victimisation. Any subsequent victimisation may in itself be the subject of disciplinary action
- Guidance and training is available to all employees to help them understand the scope and purpose of this policy and associated procedure, and relevant legislation.

5. INFORMAL STAGE

- 5.1** An employee who believes he/she is being bullied or harassed should, if possible, ask the person responsible for the bullying or harassment to refrain from it. An employee who believes he/she is being bullied may wish to complain directly to his/her line manager if he/she:
- Is reluctant to confront the person responsible for the bullying/harassment
 - Finds that the bullying/harassment continues even though he/she has asked the person carrying it out to cease doing so
 - Has experienced a form of bullying/harassment on a single occasion.
- 5.2** The line manager will then speak to the person alleged to have carried out the bullying/harassment to ascertain whether the complaint against him/her is justified or not.
- 5.3** The line manager will then provide feedback to the employee who has raised the complaint. If appropriate the manager can arrange a meeting with the complainant and the person alleged to have carried out the bullying/harassment, with the aim of re-establishing effective working relations between them.
- 5.4** If an employee has a complaint of bullying/harassment against his/her line manager, this should be raised with the line manager's manager.
- 5.5** An employee who believes he/she is being bullied may, if he/she so wishes, proceed straight to action in the 'First formal stage' (see below).
- 5.6** Bullying behaviour will not be tolerated. Anyone witnessing in-appropriate or unacceptable behaviour should come forward without fear of repercussions.

6. FIRST FORMAL STAGE

- 6.1** If the employee is dissatisfied with the outcome of action taken informally to deal with his/her complaint, he/she should write a formal letter to Greenway Training Ltd containing the following information:
- Name of the person alleged to have carried out the bullying/harassment
 - Details of what occurred
 - Dates and times when the alleged bullying/harassment occurred
 - Names of any witnesses who have actually seen or heard the alleged unacceptable behaviour

- Any action already taken to stop the alleged bullying/harassment.
- 6.2** It is courteous for the employee to notify the witness(es) that he/she is making a formal complaint and has nominated them to be interviewed as part of an investigation into the allegations. This discussion must be in confidence. The witness will be protected from any victimisation that may arise as a result of his/her agreement to be interviewed. Greenway Training Ltd will take any subsequent victimisation very seriously.
- 6.3** On receipt of a formal complaint, Greenway Training Ltd will nominate a manager to investigate. Where the alleged perpetrator is the line manager then an independent manager of suitable seniority to the complainant and alleged perpetrator will be appointed to conduct the investigation. In some circumstances an external professional investigator can be appointed to ensure objectivity and independence.
- 6.4** If the person alleged to have carried out the bullying/harassment works in proximity to the employee making the complaint, it may be expedient to transfer the former to a different work area, or even suspend him/her on full pay. Any suspension does not imply a specific outcome. Greenway Training Ltd will confirm the decision to suspend the employee on full pay in writing.
- 6.5** Investigation into the alleged bullying/harassment will be carried out:
- Promptly
 - To an agreed timetable
 - Under conditions of confidentiality
 - The investigating manager will interview the complainant in confidence. Each witness is expected to maintain confidentiality until the investigation is complete. During the interview the complainant will be made aware of the likely outcomes of a formal investigation. He/she will also be made aware of his/her rights
 - The investigating manager should arrange for the alleged perpetrator to be made aware of all allegations made. This will involve the provision of the written allegations
 - The alleged perpetrator has the right of reply and should be asked to name individuals who should be interviewed as part of the investigation because they can corroborate his/her version of events.
 - The investigating manager will then interview all those named by the complainant as witnesses. These interviews will be conducted in confidence. Each witness should not be expected to discuss the investigation with anyone else.
 - The investigating manager will then interview all those named by the alleged perpetrator in confidence.
 - Each person interviewed will have the opportunity to read and sign the interview summary notes as proof they are a fair reflection of the discussion
- 6.6** Any employee called for interview with the investigating manager may be accompanied by a colleague, family member or trade union representative.
- 6.7** Upon completion of the investigation, the investigating manager will write to both the employee who raised the complaint and the person against whom it has been made, to inform them whether or not the complaint was justified, and of their right to appeal against the decision. Discussions may be held with both individuals to identify if the findings should go to individuals at a more senior level within Greenway Training Ltd. In any event the confidences of individuals involved in the investigation will be protected.

- 6.8** The outcome of the investigation will be determined by the evidence gained throughout. Decisions about allegations made will be based on the “balance of probability” or “reasonable belief”. There is no requirement to prove beyond reasonable doubt that bullying/harassment has or has not occurred.
- 6.9** If it is decided that the complaint was justified, the person responsible for the bullying/harassment will be subject to disciplinary action in accordance with the Disciplinary Procedure.
- 6.10** If it is decided that the complaint was not justified, but that it was made in good faith, no action will be taken against the individual who raised it. If, however, it is decided that the complaint was not justified and has been brought against a person or persons with malicious intent, then the individual who raised it may be subject to disciplinary action.

7. FINAL FORMAL STAGE (appeals)

- 7.1** If the outcome of the investigation is not to the employee’s satisfaction, he/she should write to Greenway Training Ltd responsible for HR issues within five working days of receiving the investigating manager’s written decision, setting out grounds for an appeal against it.
- 7.2** Greenway Training Ltd will consider the proposed grounds for appeal and review the evidence given in the investigating manager’s report, normally within 10 working days.
- 7.3** Greenway Training Ltd will consider the appeal will notify the employee in writing, within five days, of whether it has been upheld or not. This decision is final.
- 7.4** Greenway Training Ltd will keep records of all complaints of bullying and harassment. These records will be strictly confidential and will be maintained in accordance with the Data Protection Act.