

Bullying and Harassment Policy

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Introduction

BrisDoc recognises the right of all individuals to be treated with respect and dignity. We have a commitment to providing a safe and healthy working environment that is free from bullying and/or harassment or any other behaviour that is personally offensive.

Policy Statement

BrisDoc is committed to maintaining a safe, inclusive, and respectful workplace where everyone is treated with dignity. Bullying and harassment of any kind are unacceptable and will not be tolerated. All employees, contractors, volunteers and agency workers have a right to be treated with dignity and respect, and a responsibility to behave respectfully towards others.

This policy outlines:

- BrisDoc's commitment to tackling bullying and harassment
- Support for informal and formal resolution pathways

Our legal responsibilities under the Equality Act 2010 and new duties under the Worker Protection Act 2023

This policy complements:

- The Grievance Policy
- Freedom to Speak Up Policy
- Sexual Safety Policy
- Equality, Diversity and Inclusion Policy

Purpose & Scope

This policy applies to all colleagues working for or with BrisDoc, including employees, agency workers, contractors, and volunteers. However, some formal resolution procedures (e.g. grievance and disciplinary processes) apply specifically to employees, in line with statutory requirements.

It covers all work environments and circumstances, including remote work, off-site duties, meetings, training events and social functions connected to work.

BrisDoc is committed to ensuring that everyone who works with or for us feels safe, valued and respected. The purpose of this policy is to define our approach to preventing and addressing bullying, harassment and victimisation in the workplace. We recognise the impact that such behaviours can have on individuals and teams, and we are determined to foster a culture that supports psychological safety and inclusion.

This policy supports our aim to promote dignity and respect at work, in line with our organisational values and NHS employment standards. It outlines the mechanisms available to colleagues for raising concerns—both informally and formally—and the responsibilities of individuals and managers in maintaining a respectful working environment.

We are also committed to meeting our legal obligations under the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023, which introduces a proactive duty to prevent sexual harassment in the workplace.

Definitions

Bullying – Offensive, intimidating, malicious or insulting behaviour, or misuse of power, that undermines, humiliates or injures the recipient. This may be persistent or a single serious incident.

Harassment – Unwanted conduct related to a protected characteristic (or of a sexual nature) which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation – Treating someone unfairly or subjecting them to detriment because they have made or supported a complaint or raised a concern.

Examples include:

- Unwelcome jokes, comments or gestures
- Spreading malicious rumours
- Exclusion or victimisation
- Overbearing supervision or misuse of authority
- Unwanted sexual advances

Protected Characteristics (Equality Act 2010):

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Legal Framework

This policy aligns with the following legislation:

- Equality Act 2010
- Protection from Harassment Act 1997
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Health and Safety at Work etc. Act 1974
- Employment Rights Act 1996

Under the Worker Protection Act 2023 (in force from 26 October 2024), BrisDoc has a legal duty to take reasonable steps to prevent sexual harassment in the workplace.

Prevention & Culture

At BrisDoc, we believe that preventing bullying and harassment is not just a legal obligation but a core part of building a compassionate and effective organisation. Our approach is rooted in creating a culture of psychological safety, where everyone feels empowered to speak up and confident that concerns will be taken seriously.

We are committed to actively embedding respectful behaviours through clear expectations, ongoing training, and leadership role-modelling. Prevention is not a one-off activity—it is a continual process of promoting inclusion, listening to feedback, and addressing behaviours that undermine dignity at work.

To support this, BrisDoc will:

- Provide regular, mandatory training on inclusion, dignity at work, and harassment prevention
- Clearly communicate policies and expectations through induction, refreshers, and team briefings
- Foster an open, blame-free culture that encourages early reporting of issues
- Promote the Freedom to Speak Up channels and other support routes
- Monitor patterns in concerns raised to inform training and improvements

This preventative approach sits alongside, and supports, our commitment to dealing promptly and fairly with any formal concerns raised under the procedures in this policy.

Informal Resolution

BrisDoc encourages informal resolution wherever appropriate, recognising that some concerns may be resolved quickly and constructively without needing to follow a formal process. In many cases, individuals may not be aware their behaviour is unwelcome, and a respectful conversation can lead to improved working relationships.

Where you feel safe and able to do so, you are encouraged to raise the issue directly with the person concerned, explaining why their behaviour is causing discomfort and asking them to stop. It may be helpful to keep a record of what was said and when.

If you do not feel comfortable raising the issue yourself, or if you would like support, you may speak to your line manager, another trusted manager, or a member of the People Team. Informal meetings, facilitated discussions, or signposting to internal support (such as the Freedom to Speak Up Guardian) may be offered. Where appropriate, voluntary mediation may also be considered to help resolve issues collaboratively.

Informal steps are not appropriate in every case, particularly where the behaviour is serious, repeated, or involves abuse of power. In those cases, a formal process should be followed.

Formal Procedure

If informal resolution is not appropriate or does not resolve the issue, concerns of bullying or harassment should be raised under the formal Grievance Policy.

To initiate a formal complaint, the individual should submit a written statement outlining:

- The nature of the behaviour or incident(s)
- Dates, times, and any relevant context
- Names of those involved, including witnesses (if applicable)
- Any action taken so far to address the matter

Once submitted, the following steps will take place:

1. The People Team will acknowledge receipt and determine whether an investigation is required.
2. An impartial investigating officer will be appointed, where appropriate.
3. Both parties will be given the opportunity to present their views and provide evidence.
4. The investigation will be conducted sensitively, confidentially and without unnecessary delay.
5. A written outcome will be shared with the person raising the concern, and with the person against whom the concern was raised.
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6. If disciplinary action is required, this will follow BrisDoc's Disciplinary Policy.
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7. The complainant will be informed of the outcome and has the right to appeal if dissatisfied.

In cases where the concern relates to a member of senior leadership, or where you do not feel safe or confident raising your concern through the usual internal routes, you may escalate the issue directly to the Freedom to Speak Up Guardian or request that an external, independent investigator be appointed. BrisDoc is committed to ensuring that all concerns are handled fairly, regardless of the role or seniority of the individuals involved.

Support will be offered to all parties throughout the process.

Support Available

BrisDoc recognises that experiencing or reporting bullying or harassment can be distressing. A range of internal and external support options are available to ensure colleagues feel safe, supported, and informed throughout any resolution process.

Available support includes:

- Line Manager or another trusted manager – to listen and explore appropriate next steps
- People Business Partner – to provide impartial advice and guidance
- Freedom to Speak Up Guardian – for confidential support in raising concerns
- Mindful Employer Helpline (0300 555 6006) – for independent, confidential emotional support
- Health and Wellbeing Hub – for resources on stress, resilience, and support pathways
- Trade Union or Representative – for formal representation and advice
- ACAS Helpline (0300 123 1100) – for general employment rights advice

All colleagues involved in a case—whether as complainant, subject of concern, witness, or manager—will be offered appropriate support. Support will be made available before, during, and after any informal or formal process.

Confidentiality will be maintained wherever possible, in line with BrisDoc's data protection obligations and duty of care.

Responsibilities

All colleagues must:

- Treat colleagues with respect
- Speak up early about concerns
- Engage with procedures in good faith

Managers must:

- Promote zero-tolerance culture
- Act on concerns and complaints fairly and promptly
- Support informal and formal resolution routes

The People Team will:

- Provide support and guidance
- Monitor implementation and identify trends
- Ensure this policy remains up to date and aligned to law and best practice

Monitoring and Review

This policy will be reviewed every 3 years or sooner in line with legal or organisational changes.

Implementation and effectiveness will be monitored via training compliance, reported incidents, case analysis, and colleagues feedback.

Equality Impact Assessment

BrisDoc is committed to promoting equality, diversity and inclusion across all aspects of its work. In line with the Equality Act 2010 and the Public Sector Equality Duty, this policy has been subject to an Equality Impact Assessment.

The purpose of the EQIA is to ensure that the policy does not unlawfully discriminate against any protected groups and that it promotes equal opportunity and fosters good relations among colleagues and stakeholders.

Protected characteristics considered as part of this assessment include:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

No adverse impacts have been identified.

The policy promotes a fair, respectful and inclusive working environment and sets out clear expectations for behaviour and support across all workforce groups. BrisDoc will continue to monitor the implementation of this policy to ensure equity in outcomes and access to support.

Appendix A: Guidance for Employees

This guidance is for any employee who believes they may be experiencing bullying or harassment.

If you believe you are being bullied or harassed, you are entitled to be treated with dignity and respect. BrisDoc takes such concerns seriously and encourages early action to address inappropriate behaviour and protect your wellbeing.

What You Can Do

If you feel able, make it clear to the individual that their behaviour is unwelcome and causing distress. Sometimes people are unaware of the impact of their actions and will stop when challenged respectfully. In all cases, it is advisable to keep a personal record of incidents. This should include:

- Dates, times, and locations
- A description of what was said or done
- How it made you feel
- The names of any witnesses

These notes can help you if you decide to raise a formal concern.

Who You Can Speak To

You are encouraged to speak with someone you trust. Options include:

- Your line manager, unless they are involved
- Another senior manager in your team or department
- A member of the People Team: workforcesupport@brisdod.org
- A trusted colleague who may support you during discussions
- A representative from your professional body (e.g. NMC, GMC)
- Your union or employee representative
- The Freedom to Speak Up Guardian
- The Mindful Employer Helpline (0300 555 6006) – confidential and anonymous
- The Wellbeing Hub (see: Radar –Wellbeing Hub)
- ACAS Helpline (0300 123 1100) – for impartial workplace advice

These individuals and services can support you, help explore your options, and guide you through next steps.

Employment Status and Process Eligibility

BrisDoc encourages all colleagues to speak up if they experience or witness bullying or

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harassment. While the support options listed here are available to everyone who works with BrisDoc—including agency workers, volunteers, and contractors—the formal grievance and resolution procedures (outlined below) apply specifically to employees, in line with employment law.

If you're unsure whether these procedures apply to your role, you can contact the People Team for advice and support.

Raising a Concern Formally

If the concern is serious or not resolved informally, you may raise it formally through the Grievance Policy. This can be done verbally or in writing to:

- Your line manager
- Any senior manager
- A member of the People Team

Where possible, BrisDoc recommends raising concerns early with your line manager to allow swift resolution, but you are not limited to this route.

Important: You should never feel unable to speak up, even if the individual involved is more senior. BrisDoc is committed to maintaining a culture where all concerns are taken seriously and addressed appropriately.

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Change Register

The following changes have been made between the February 2016 (v2) policy and the July 2021 (v3) policy.

Section	Change
1.	Part of introduction moved to 3. Scope. Introduction updated.
2	Updated
4.	Policy section removed
4.1.1 / 4.1.2 / 4.1.3	Removed reference to marriage, civil partnership, maternity and pregnancy.
4.2	Removed “These examples are not exhaustive and disciplinary action at the appropriate level will be taken against staff committing any form of personal harassment or bullying”.
4.3	Removed comment in relation to untrue complaints. Information added within 5.1.
5.1.1	Additional information added
6	Roles and responsibilities section added
8	Support section added
Appendix 1	Added
June 2025	Review date extended by 3 months to December 2025 as agreed with R Hancock
October 2025	Legislation/framework checked: Equality Act 2010 (s.26), Worker Protection Act 2023 (in force Oct 2024), ACAS Code

The following changes have been made between V3.1 and V3.2. 2025.

- Incorporation of the Worker Protection (Amendment of Equality Act 2010) Act 2023
- Addition of the employer’s new legal duty to take reasonable steps to prevent sexual harassment
- Refreshed language to support a proactive, inclusive and psychologically safe culture
- Structural improvements for clarity and ease of use by colleagues