

September 2025



PREVENTION OF BULLYING & HARASSMENT POLICY

Issue date: September 2025

Signed:

A handwritten signature in black ink, appearing to be "E. J. J.", is placed over a light blue rectangular background.

Review period: Annually

PREVENTION OF BULLYING & HARASSMENT POLICY ISSUES AND UPDATES

PAGES	ISSUE	DATE
All	3 - updated with Worker Protection Act 2023	23/10/24

The following policy has been approved by the Senior Leadership Team and the Board of Trustees.

The policy will be reviewed on an annual basis unless circumstances arise requiring the policy to be reviewed earlier.

Approved by Board of Trustees:

Board signatory: Jon Drown

Planned review: July 2026

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PREVENTION OF BULLYING & HARASSMENT POLICY

1. Introduction

This policy does not form part of any employee's contract of employment. Northampton Saints Foundation reserves the right to vary it at any time and we will notify you in writing of any changes.

This policy is applicable to those who are employed by Northampton Saints Foundation.

2. Policy Statement

Northampton Saints Foundation is committed to encouraging and maintaining good employee relations within a working environment which promotes team working and encourages employees to give of their best. Everyone at Northampton Saints Foundation and those who have dealings with Northampton Saints Foundation has a responsibility to maintain good working relationships and not use words or deeds that may harm the wellbeing of others. In addition to the obligations placed upon both employers and employees by equality and human rights legislation, everyone has the right to be treated with consideration, fairness, dignity, and respect. This contributes to a workplace environment in which individuals feel safe and can work effectively competently and confidently.

The policy applies to all employees working within the Foundation and to all employees working off the premises. It extends to include non-permanent workers such as secondees, contractors, agency, temporary employees, consultants, and any other workers. The policy, in addition, covers the behaviour of employees outside working hours which may impact upon work or working relationships.

Northampton Saints Foundation has a "zero tolerance" policy and will investigate vigorously any allegations of bullying or harassment, regardless of whether the matter has been raised formally or informally.

3. Key Principles

Northampton Saints Foundation will provide and sustain a safe working environment in which everyone is treated fairly and with respect. Those working or dealing with Northampton Saints Foundation must not encounter harassment, intimidation, or victimisation on the basis of gender, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union membership, disability, offending background, or any other personal characteristic.

Everyone carries a personal responsibility for their own behaviour and for ensuring that their conduct is in accordance with the principles set out in this policy. In addition, each person has a responsibility to report any instance of bullying or harassment which they witness, or which comes to their attention. Employees have a responsibility to act as role models, pro-actively addressing instances of bullying and harassment. Managers should also make themselves aware of their responsibility.

4. Definitions

Harassment may be defined as any conduct which is:

- Unwanted by the recipient.
- Is considered objectionable.
- Causes humiliation, offence, distress, or other detrimental effect.

Harassment may be an isolated occurrence or repetitive; it may occur against one or more individuals. Harassment may be, but is not limited to:

- Physical contact – ranging from touching to serious assault, gestures, intimidation, aggressive behaviour.

- Verbal – unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter, offensive language.
- Non-verbal – offensive literature or pictures, graffiti and computer imagery, isolation or non-co-operation and exclusion or isolation from social activities.

Sexual Harassment is a specific form of harassment, and it can often be subtle, indirect, or even unintentional. Sexual harassment includes unwanted or unwelcome sexual advances, requests for sexual favours, or other verbal, physical, or visual conduct of a sexual nature within the workplace. It also covers any third-party harassment where a person is harassed by someone who does not work for the Company, such as a visitor or client.

We recognise the seriousness of sexual harassment, and we have zero tolerance towards this. Employees are encouraged to report any incidents of harassment by colleagues or third parties which they experience or witness. Obvious examples are:

- Unwanted touching or physical contact.
- Sending or displaying sexually explicit or suggestive materials.
- Making seemingly “harmless” jokes, comments or gestures with a sexual undertone.
- Suggesting or implying that employment, promotion, or other benefits depend on sexual favours.
- Asking personal questions about someone’s romantic or sexual life.
- Repeatedly giving compliments on someone’s appearance, dress, or body that go beyond normal workplace politeness.
- Standing too close, touching, or brushing against someone unnecessarily.
- Persistently asking someone out on dates or inviting them to social activities outside of work after they have declined or shown disinterest.

Bullying is unlikely to be a single or isolated instance. It is usually, but not exclusively repeated and persistent behaviour, which is offensive, abusive, intimidating, malicious or insulting. Bullying includes but is not limited to:

- Conduct which is intimidating, physically abusive or threatening.
- Conduct that denigrates, ridicules, or humiliates an individual, especially in front of employees.
- Humiliating an individual in front of employees.
- Picking on one person when there is a common problem.
- Shouting at an individual to get things done.
- Consistently undermining someone and their ability to do the job.
- Setting unrealistic targets or excessive workloads
- “cyber bullying” i.e., bullying via e-mail or social media. (This should be borne in mind where employees are working remotely and are managed through online means. Care and sensitivity should be practised with regard to the choice of context and language).
- Setting an individual up to fail e.g., by giving inadequate instructions or unreasonable deadlines.

Harassment and bullying may be summarised as any behaviour that is unwanted by the person to whom it is directed. It is the impact of the behaviour rather than the intent of the perpetrator that is the determinant as to whether harassment or bullying has occurred.

5. Our Commitment

- We will deliver regular training sessions for all employees so that you have a comprehensive understanding of what sexual harassment is and your role in preventing and addressing it.
- We will also ensure that additional training, education and guidance to the Leadership Team and all line managers to give them the confidence to tackle sexual harassment.
- We recognise the need for regular risk assessments and audits to identify and mitigate risks of sexual harassment. We will actively consider the risks of sexual harassment occurring in the

course of employment and devise and implement reasonable steps we can actively take to reduce those risks and proactively prevent sexual harassment occurring.

- We will follow a clear, fair and supportive procedure to encourage the reporting of potential or alleged sexual harassment in the course of employment which is described below.

6. Complaints Procedure

Any employee who wishes to make a complaint of harassment or bullying is encouraged to first discuss matters informally with their line manager, provided that they feel able to do so. Should the issues not be resolved at this stage, or the employee feels unable to raise the issue informally, then a formal resolution should be sought.

When a complaint of harassment or bullying is brought to the attention of a manager at any level, whether informally or formally, prompt action must be taken to investigate the matter. Corrective action must be taken where appropriate, and this may require an investigation under the Disciplinary Procedure.

If it is considered that one of the parties concerned in a harassment or bullying case should be moved from their current workplace, then as a matter of principle Northampton Saints Foundation will normally remove the alleged perpetrator rather than the complainant. However, the final decision on who should be moved should reflect the particular circumstances of the case and advice from senior management. It should be noted and explained to those concerned that the moving of either party is not an implication of guilt or culpability and no detriment to either party will be construed as a consequence.

All matters relating to the investigation of complaints of harassment or bullying will be treated in strict confidence. Any breach of confidentiality in this regard may render those responsible liable to disciplinary actions. However, it will be necessary that any alleged perpetrator is made aware of the allegations against them and the name(s) of those making the allegations together with the name(s) of any witnesses.

No employee will be victimised or suffer detriment for making a complaint of harassment or bullying and no manager shall threaten either explicitly or implicitly that an employee's complaint will be used as the basis for decisions affecting that employee. Such conduct will be treated as a very serious disciplinary offence. Similarly, managers are required to act on any complaint of harassment or bullying. Failure to do so will be regarded as misconduct which if proven, will result in disciplinary action.

All complaints of harassment or bullying whether raised formally or informally must be notified by the recipient of the complaint to HR.

APPENDIX 1

PROCEDURE

Informal Resolution

Very often people are not aware that their behaviour is unwelcome or misunderstood and an informal discussion can lead to greater understanding and agreement that the behaviour will cease.

Complainants are therefore encouraged to try, if they feel able to do so, to resolve the problem informally by making it clear to the alleged harasser that his/her actions are unwanted and should not be repeated. This may be done verbally or in writing in which case the complainant should keep a copy of the documentation and, where possible, the times and dates of incidents should be recorded.

If the complainant feels unable to approach the alleged harasser, another employee, or Trade Union representative could be asked to speak to the alleged harasser on the complainant's behalf. A note should be made of the action taken and the matter notified to senior management.

An individual who is made aware that their behaviour is unacceptable should:

- Listen carefully to the complaints and the particular concerns raised.
- Respect the other persons point of view; everyone has a right to work in an environment free from harassment/intimidation.
- Understand and acknowledge that it is the other persons reaction/perception to another's behaviour that is important.
- Agree the aspects of behaviour that will change.
- Review their general conduct/behaviour at work and with workplace employees.

Formal Resolution

If the alleged harassment continues, the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally following the Grievance Procedure.

Records

Where the complaint is informal and resolved at this stage, no record will be kept on personal files.

Following formal investigation, where the complaint is not substantiated, no records will be retained.

Where a complaint is substantiated or partially substantiated but does not proceed to disciplinary, a letter confirming the outcome will be retained on the perpetrator's personal file and supporting documentation retained in a separate file for a period of 12 months.

Where the matter proceeds to a disciplinary hearing then the storage of records should be in accordance with the disciplinary procedure.