**Harassment and Whistleblowing**

**Harassment Policy and Procedures**

**Policy Statement**

The Society is committed to providing a working environment in which all employees, workers, volunteers, contractors, office holders, members and visitors are treated with dignity and respect.

The Society will not tolerate discrimination, harassment, sexual harassment, bullying or victimisation of any kind. All complaints will be taken seriously and dealt with promptly, fairly and confidentially.

**Definition of Harassment**

Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Protected characteristics are:

- age;
- disability;
- gender reassignment;
- race;
- religion or belief;
- sex; and
- sexual orientation.

Harassment may be physical, verbal or non-verbal and may include, but is not limited to:

- offensive comments, jokes, banter or ridicule;
- unwanted physical contact;
- exclusion, intimidation or humiliation;
- offensive emails, messages, social media posts or images;
- mocking or mimicking a person's accent, appearance, disability, beliefs or characteristics; and
- any other behaviour that causes a person to feel threatened, humiliated, intimidated, degraded or offended.

The Society also prohibits sexual harassment, which is unwanted 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.

Harassment may occur in the workplace, at work-related events, during business travel, through electronic communications, or on social media where there is a sufficient connection with work.

**Prevention of Harassment**

The Society will take reasonable steps to prevent harassment and sexual harassment and to promote a working environment in which all individuals are treated with dignity and respect.

The Society expects all employees and others working on its behalf to comply with this policy and to contribute to a respectful and inclusive workplace culture.

Harassment by third parties, including members, customers, contractors, suppliers, conference attendees and visitors, will not be tolerated. Complaints involving third parties will be investigated and appropriate action taken.

**Reporting Discrimination or Harassment**

Discrimination and harassment are often complex matters and there is no single approach that will be suitable in every case.

Where appropriate, an employee who feels able to do so may raise the matter informally with the individual concerned or with their line manager.

If an employee wishes to make a formal complaint, they should use the Society's Grievance Resolution Procedure as set out in the Staff Handbook.

All allegations of discrimination, harassment or sexual harassment will be treated seriously and investigated promptly, impartially and confidentially, as far as reasonably practicable.

**Investigation of Complaints**

If an employee is accused of discrimination, harassment or sexual harassment, the Society will investigate the matter fully.

During the investigation, the employee concerned will be informed of the allegations and given a fair opportunity to respond and provide an explanation of their actions.

Where appropriate, the Society may take temporary measures during an investigation to protect those involved.

**Outcomes**

If the Society concludes that discrimination, harassment or sexual harassment has not occurred, no further action will normally be taken.

If the Society concludes that a complaint was made knowingly falsely, maliciously or in bad faith, disciplinary action may be taken against the complainant.

No action will be taken against a person who raises a complaint in good faith simply because the complaint is not upheld.

If the Society concludes that an employee's conduct amounts to discrimination, harassment or sexual harassment, disciplinary action may be taken, up to and including summary dismissal for gross misconduct.

**Victimisation**

The Society prohibits victimisation of any person who:

- raises a complaint under this policy;
- supports another person's complaint;
- provides evidence or information during an investigation; or
- otherwise exercises rights under equality legislation.

Any employee found to have victimised another person may be subject to disciplinary action.

**Monitoring and Review**

The Society will monitor the effectiveness of its policies and procedures and will review them periodically to ensure compliance with legal requirements and good practice.

The Society will implement changes where necessary to improve the working environment and to reflect developments in legislation, guidance and social expectations.

This commitment applies to all employment policies and procedures, not only those relating to equality, diversity and inclusion.

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**Whistleblowing**

**Introduction**

The Society is committed to conducting its affairs with honesty, integrity and accountability.

Whistleblowing occurs when a worker raises a concern about suspected wrongdoing, misconduct or illegal activity that is in the public interest and affects others, rather than being solely a personal employment concern.

The Society encourages individuals to raise concerns as soon as possible where they reasonably believe that wrongdoing has occurred, is occurring, or is likely to occur.

**Matters That May Be Reported**

Examples of concerns that may be raised under this policy include:

- criminal offences;
- fraud, bribery or financial malpractice;
- breaches of legal or regulatory obligations;
- health and safety risks;
- environmental damage;
- safeguarding concerns;
- discrimination, harassment or other serious misconduct;
- misuse of Society funds or resources;
- attempts to conceal any of the above.

This list is not exhaustive.

**Raising a Concern**

Concerns should normally be raised with the employee's line manager in the first instance.

Where this is not appropriate, concerns may be raised with:

- the Chief Executive;
- a Director or senior manager; or
- the Chair of the Board or another designated trustee where the concern involves senior management.

Concerns may be raised verbally or in writing and should include, where possible:

- the nature of the concern;
- relevant facts, dates and locations;
- the names of any individuals involved; and

- any supporting evidence available.

**Investigation**

The Society will assess all concerns promptly and determine the appropriate course of action.

Where necessary, a formal investigation will be undertaken.

The Society will endeavour to keep the whistleblower informed of progress, subject to legal, confidentiality and data protection requirements.

**Protection for Whistleblowers**

No worker will suffer dismissal, disciplinary action, detriment, victimisation or any other disadvantage for raising a genuine concern where they reasonably believe that the information disclosed indicates wrongdoing and that the disclosure is in the public interest.

Any individual who retaliates against a whistleblower may be subject to disciplinary action.

**Confidentiality**

The Society will treat whistleblowing concerns as confidential wherever possible and will protect the identity of the person raising the concern to the extent permitted by law and the need to conduct a proper investigation.

**External Disclosures**

The Society encourages concerns to be raised internally wherever appropriate. However, nothing in this policy prevents an individual from making a protected disclosure to a prescribed regulator or other appropriate authority in accordance with applicable whistleblowing legislation.

**Review**

This policy will be reviewed periodically to ensure continued compliance with legal requirements and good practice.