

## 1. About this policy

- 1.1. Clipfine is committed to providing a working environment free from harassment, bullying, and work-related violence and ensuring all staff are treated, and treat others, with dignity and respect.
- 1.2. This policy covers harassment, bullying or work-related violence which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.
- 1.3. Clipfine will treat any reports of work-related violence, threats, harassment or abuse seriously and respond to them promptly.

## 2. Definition of work-related violence

'Any incident in which an employee is abused, threatened or assaulted by a member of the public in circumstances arising out of the course of his/her employment.' This is based on the Health and Safety Executive's definition.

## 3. Definition of Harassment

Harassment is unwanted conduct whether verbal or not, based on all categories as stated in the Equal Opportunities Policy, which affects the dignity of all employees at work; or bullying of colleagues by intimidating, hostile, degrading, humiliating or offensive behaviour. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

- 3.1. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.
- 3.2. Harassment may include, for example:
  - 3.1.1. unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
  - 3.1.2. unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
  - 3.1.3. offensive e-mails, text messages or social media content;
  - 3.1.4. mocking, mimicking or belittling a person's disability.
- 3.3. A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.
- 3.4. A single incident can amount to harassment if sufficiently grave.
- 3.5. All staff is entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Harassment is a serious disciplinary offence and incidents will be dealt with under the disciplinary procedure.

## 4. Definition of bullying

- 4.1. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.
- 4.2. Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:
  - 4.1.1. physical or psychological threats;
  - 4.1.2. overbearing and intimidating levels of supervision;
  - 4.1.3. inappropriate derogatory remarks about someone's performance;
- 4.3. Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

## 5. Complaints

- 5.1. Clipfine will:
  - 5.1.1. Respond to and, where possible, resolve incidents, ideally before they escalate;
  - 5.1.2. Monitor incidences of violence and abuse and initiate appropriate action as required; and
  - 5.1.3. Where possible, direct staff to appropriate support and advice after an incident has occurred.
- 5.2. If an official investigation is needed, work with the police and offer any assistance needed to help in their enquiries;
- 5.3. All employees and contractors have a responsibility to act in a way that does not incite or increase the likelihood of violence.
- 5.4. Any individual found to be encouraging or inciting violence or not resolving potentially violent or abusive situations may be subject to disciplinary action.
- 5.5. Attempts may be made to resolve any problems informally but all employees have the right to bring a formal complaint if they feel they are being harassed or bullied. All complaints will be thoroughly and expeditiously investigated.
- 5.6. The Company will ensure that the complainant is not in any way penalised whether directly or indirectly for raising a complaint. No member of staff will be blamed for an instance of work-related violence caused by a customer or member of the public.
- 5.7. However, should the investigation identify that the complaint was of a malicious nature, disciplinary action may be taken against the employee who raised the complaint.
- 5.8. Clipfine will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. 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. Clipfine will consider whether any steps are necessary to manage any ongoing relationship between the complainant and the person accused during the investigation.
- 5.9. Once the investigation is complete, Clipfine will inform the complainant of its decision. If Clipfine considers that the complainant has been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a

third party such as a customer or other visitor, Clipfine will consider what action would be appropriate to deal with the problem. Whether or not the complaint is upheld, Clipfine will consider how best to manage any ongoing working relationship between the complainant and the person concerned.

## 6. Record Keeping

- 6.1. Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. [These will be processed in accordance with our Data Protection Policy.]

This policy applies to all employees of Clipfine Limited.

Date: November 2018

Signed:



T. MacCarron  
Chairman

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