

Bullying & Harassment Policy

Approved May 2025

Approved by Glenn Howes, Trustee

1 POLICY STATEMENT

1.1 All staff are entitled to work in an environment that upholds their personal dignity and is free from intimidation. Harassment in the workplace is unlawful; it creates a toxic atmosphere that can severely impact the health, confidence, morale, and performance of those directly affected. It can also negatively affect others who witness the behaviour or are aware of it, even if they are not the direct targets.

1.2 Bullying and harassment are disciplinary offences and incidents will be dealt with under the Natural World Fund's Disciplinary Procedure.

1.3 This policy applies to everyone working for Natural World Fund or at any of Natural World Fund's premises, regardless of their role, level, or employment status. This includes employees, managers, directors, officers, consultants, contractors, trainees, remote workers, casual or agency staff, and volunteers (collectively referred to as "staff" throughout this policy). It covers incidents of bullying or harassment that take place both within the workplace and in external settings such as business trips, events, or work-related social gatherings.

1.4 The Equality Act 2010 prohibits harassment related to characteristics such as age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, and sexual orientation. The Protection from Harassment Act 1997 makes it unlawful to engage in behaviour which the employee knows or ought to know would be harassment, which includes causing someone alarm or distress. Additionally, the Health and Safety at Work Act 1974 ensures that all staff have the right to a safe working environment and systems of work.

1.5 In certain circumstances, individual staff members may be held legally liable for harassment of colleagues or third parties, including customers, and may be ordered to pay compensation as determined by a court or employment tribunal.

2 HARRASSMENT

2.1 Harassment is any unwanted physical, verbal, or non-verbal behaviour that is intended to, or has the effect of, violating a person's dignity or creating an environment that is intimidating, hostile, degrading, humiliating, or offensive. A single incident may constitute harassment. It also

includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

2.2 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.

Unlawful harassment can include behaviour of a sexual nature (sexual harassment), or actions related to protected characteristics such as age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation. However, harassment is unacceptable regardless of whether it is linked to any of these specific categories.

2.3 Harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing, grabbing, brushing past someone, invading their personal space, and more serious forms of physical or sexual assault;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless), and suggestions that sexual favours may further a career or that a refusal may hinder it;
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
- offensive or intimidating comments or gestures, or insensitive jokes or pranks;
- mocking, mimicking or belittling a person's disability;
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- outing or threatening to out someone as gay or lesbian; or
- ignoring or shunning someone, for example, by deliberately excluding them from a conversation or a workplace social activity.

2.4 An individual can be harassed even if they are not the direct or intended target. For instance, someone may feel harassed by racist jokes aimed at a different ethnic group if those comments contribute to creating an offensive or hostile environment for them.

3 BULLYING

3.1 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. Bullying can take the form of physical, verbal and non-verbal conduct.

Bullying is behaviour that is offensive, intimidating, malicious, or insulting, and involves a misuse of power that can make a person feel vulnerable, distressed, humiliated, undermined, or threatened. Power in this context isn't limited to formal positions of authority—it can also include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal, or non-verbal conduct.

3.2 Bullying may include, by way of example:

- shouting at, being sarcastic towards, ridiculing or demeaning others;
- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate and/or derogatory remarks about someone's performance;
- abuse of authority or power by those in positions of seniority; or
- deliberately excluding someone from meetings or communications without good reason.

3.3 Legitimate, reasonable and constructive criticism of an employee's performance or conduct, as well as appropriate instructions issued in the normal course of work, will not amount to bullying on their own.

4 DEALING WITH BULLYING AND HARASSMENT

Informal approach

4.1 Where the harassment is minor, employee(s) are advised to clearly communicate to the harasser that the behaviour is unacceptable and must cease. Anyone who believes they are experiencing bullying or harassment should report the issue to their manager or a senior member of staff.

4.2 If the employee feels uncomfortable or finds it too difficult or embarrassing to address the issue directly, their manager or a senior manager can either participate in an informal meeting between them and the individual concerned or, if the employee prefers, speak to the individual on their behalf.

4.3 The purpose of the informal stage is to resolve the issue without the need for further formal action within Natural World Fund, although this will depend on the nature of the matter concerned and the outcome of the discussions.

Formal approach

4.4 Where informal resolution is not appropriate, is not requested or where the outcome has

been unsatisfactory, the employee may submit a formal written complaint to the Chief Executive—or the Chairman of the Board if there is no Chief Executive in place. The complaint will be acknowledged, and a suitable individual will be appointed to conduct an investigation.

4.5 If the employee desires, their manager or a senior manager will help prepare the complaint and may also accompany them to any related meetings. Alternatively, the employee may choose to be accompanied by a colleague or a Trade Union representative. All complaints will be investigated promptly and thoroughly, with the process carried out independently and objectively by an individual who is not involved in the allegations and holds a position of equal or greater seniority than the person accused.

4.6 Wherever feasible, investigations will be completed within two weeks of receiving the complaint.

4.7 Where a complainant has initiated this formal procedure, Natural World Fund reserves the right to invoke its disciplinary procedures against the alleged harasser at any time.

4.8 Investigations will be conducted with care, ensuring sensitivity and due respect for the rights of both the complainant and the individual accused. Anyone interviewed during the process will have the right to be accompanied by a colleague or Trade Union representative. The importance of maintaining confidentiality will be emphasised to all participants, and strict instructions will be given not to discuss the matter with colleagues or friends. Any breach of confidentiality may result in disciplinary action.

4.9 The investigation will concentrate on establishing the factual basis of the complaint. Records will be maintained at every stage, and individuals interviewed will be provided with notes from their interviews for review and agreement. Efforts will be made to avoid requiring anyone to repeat distressing or sensitive details more than is absolutely necessary.

4.10 Wherever feasible, steps will be taken to ensure that the complainant and the alleged harasser do not have to work together while the investigation is ongoing. If it is not practical to reassign duties for either party, the complainant will be offered the option of taking special leave, should they wish to do so.

4.11 The complainant will be kept updated on the overall progress of the investigation and will be informed of the outcome, including whether the complaint has been upheld and if disciplinary action will be taken. The confidentiality of any disciplinary measures concerning the alleged harasser will be respected in accordance with their rights.

4.12 If a complaint is upheld, consideration will be given—wherever practicable—to allowing the complainant to decide whether they wish to remain in their current role or transfer to a different position.

4.13 Natural World Fund will seek to ensure that the complainant is not in any way penalised, either directly or indirectly, as a result of raising a complaint. The situation will be monitored to

ensure that any harassment has ceased. Even if a complaint is not upheld—such as in cases where evidence is inconclusive—consideration will still be given to making arrangements that prevent the parties from having to continue working together if either party objects.

4.14 Any complaint found to be unfounded and not made in good faith—for example, a malicious complaint—will be considered a disciplinary offence.

4.15 Details of all formal complaints of harassment or bullying will be collated by the Chief Executive—or the Chairman of the Board if there is no Chief Executive in place. These records will be reviewed annually by the Board to ensure that all reasonable measures have been taken to prevent workplace harassment and to assess the effectiveness of the complaints procedure.

4.16 If an employee believes they have been subjected to conduct that may constitute a criminal offence (such as sexual assault), they have the right to seek support from their manager or a senior manager. This support may include accompanying the employee to make a formal report to the police or providing any other necessary assistance. The manager will inform the Chief Executive—or the Chairman of the Board if no Chief Executive is in place—of the general circumstances of the case and will coordinate with them to arrange special discretionary compassionate leave for the employee, if appropriate.

4.17 A formal written complaint should include the following:

- Name of alleged offender
- Nature of the alleged offence
- Dates and times of alleged incident/s as near as possible
- Names of any witnesses to the alleged incident/s
- Information on any action the employee has taken to prevent or halt the alleged behaviour.

4.18 In addition to the measures outlined in this policy, employees may also raise concerns about workplace harassment through the Grievance Procedure.

5 APPEALS

5.1 If the employee is dissatisfied with the outcome, they may submit a written appeal to the Chief Executive—or to the Chairman of the Board if no Chief Executive is in place—outlining their full grounds for appeal, within 14 days of receiving the decision.

5.2 An appeal meeting will be held, and Natural World Fund will aim to hold this within one week of receiving the written appeal. The appeal will be reviewed by the Chief Executive, Chairman of the Board, or another Trustee designated by the Chairman, depending on their prior involvement in the case. They will meet with the employee and their representative, if they wish. The final decision will be communicated in writing, typically within one week of the appeal hearing. This decision marks the conclusion of the procedure, and no further appeals will be permitted.

6 PROTECTION AND SUPPORT

6.1 Staff who submit complaints or participate in good faith in any investigation under this policy must not face any form of retaliation or victimisation as a result. If an employee feels they have been subjected to such treatment, they should notify their manager. If the issue is not remedied, the employee should formally raise it using the Grievance Procedure.

6.2 Anyone found to have retaliated against or victimised an individual for making a complaint or assisting in good faith with an investigation under this procedure will face disciplinary action in accordance with the Disciplinary Procedure.

6.3 Depending on the nature of the allegations, the individual accused of harassment or bullying may be required to participate in training.

7 CONFIDENTIALITY AND DATA PROTECTION

7.1 Confidentiality is a crucial aspect of the procedure outlined in this policy. All individuals involved, whether making a complaint or participating in an investigation, are responsible for maintaining the required high level of confidentiality. Information about the investigation, including the identities of the complainant and the accused, should only be shared on a "need to know" basis.

7.2 Details of a complaint made by or about an employee may be added to the employee's personnel file, including a record of the outcome and any notes or documents generated during the process.

7.3 A breach of confidentiality may result in disciplinary action.

End of policy