



Bullying and Harassment Policy

2026

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Statement of Policy

Integrating deplores all forms of personal harassment and bullying and seeks to ensure that the working environment is sympathetic to all our employees.

We have published these procedures to inform employees of the type of behaviour that is unacceptable and provide employees who are the victims of harassment or bullying with a means of redress.

Integrating recognises that we have a duty to implement this policy and all employees are expected to comply with it.

Introduction

Bullying, harassment or victimisation on the grounds of race, colour, nationality, ethnic or national origin, sex, marital status, gender reassignment, sexual orientation, religious belief, disability or age is unacceptable. This policy covers all types of harassment.

Harassment may include bullying behaviour and refers to bad treatment that is related to a protected characteristic, such as age, sex, pregnancy, disability, race, gender, religion or sexual orientation. More specifically, the law defines it as 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.' It can include behaviour that individuals find offensive even if it's not directed at them, and even if they do not have the relevant protected characteristics themselves.

Victimisation broadly refers to bad treatment directed towards someone who has made or is believed to have made or supported a complaint under the Equality Act. It includes situations where a complaint hasn't yet been made but someone is victimised because it's suspected they might make one. If an individual gives false evidence or makes an allegation in bad faith, then they are not protected from victimisation under the Act.

Bullying can be defined as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power that undermines, humiliates, denigrates or injures the recipient (emotionally or physically) – but it doesn't have a legal definition in the Equality Act. In fact, bullying behaviour is very similar to harassment, but it is not related to a protected characteristics.

Integrating recognises that bullying and personal harassment can exist in the workplace, as well as outside, and that this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating and unpleasant working environment.

Examples of Harassment

Harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Harassment is unwanted behaviour by one employee towards another or several employees and examples of harassment include:

- offensive comments based on a protected characteristic
- insensitive jokes and pranks
- lewd or abusive comments about appearance
- deliberate exclusion from conversations
- abusive or offensive writing or material including via email, text or social media
- unwelcome touching
- abusive, threatening or insulting words or behaviour.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment. Serious acts of harassment will be classed as gross misconduct and can lead to summary dismissal.

Examples of Bullying

Bullying is persistent behaviour, directed against an individual or group that creates a threatening or intimidating work environment which undermines the confidence and self-esteem of the recipient. Bullying is not performance managing someone in an appropriate way or giving constructive feedback to people regarding their behaviour or performance.

Examples of bullying include:

- verbal abuse (for example harsh or undermining treatment; verbal intimidation or threat; verbal abuse, including racist, sexist, homophobic or other prejudiced remarks)
- abuse of power or unfair sanctions
- practical jokes, initiation ceremonies
- physical bullying (for example intimidating physical presence; inappropriate touch; physical assault; intentional damage of property or work)
- social bullying (for example belittling in front of colleagues; lying, spreading rumours or making comments to damage someone's reputation; unjustifiable preferential treatment of others; excluding from activities/opportunities, or encouraging others to exclude)
- Cyber/remote bullying (for example using text message, email or social media to deliver abusive, undermining or hurtful messages; online

intimidation or harassment; intentional exclusion of others from online forums; public sharing of private information without consent).

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of bullying. Serious acts of bullying will be classed as gross misconduct and can lead to dismissal.

Complaining about Bullying or Harassment

1. Stage 1- Informal Complaint

In the first instance, employees should raise any issues directly with their line manager immediately verbally or in writing. If the matter itself concerns the employee's immediate manager, then the complaint should be taken to their superior. At this informal stage, every effort should be made by all parties involved, including the employee who raised the concern, to resolve matters without recourse to the formal procedures.

At this stage, all those involved should keep a note of the actions/discussions in case they are needed to inform any subsequent formal stages. If any specific actions are agreed at the informal stage, these will be noted and agreed by both parties.

If you are the victim of minor harassment/bullying, you should make it clear to the perpetrator on an informal basis that their behaviour is unwelcome and ask the perpetrator to stop. If you feel unable to do this verbally then you should hand a written request to the person.

2. Stage 2 – Formal Complaint

If the manager is unable to resolve the matter at this time, a formal written complaint should be submitted. Formal complaints must be made to The Business Manager in person, by email or in writing (preferably on the Complaint Form Annex B).

The date the complaint is received is recorded and The Business Manager will acknowledge receipt of the complaint in writing (either by letter or email) **within 5 working days**.

The Business Manager can consider whether a face-to-face investigation meeting is the most appropriate way of doing this. If so, this will be arranged within **ten working days** of receiving the written complaint. The Complaints Officer is free to invite any other member of Integrating for advice on specific issues or for safety concerns. The complainant can bring along somebody for support or to speak on their behalf. A written response provided to the complainant within **five working days** of the investigation meeting. This is the end of the complaint.

However, in some circumstances, the employee may remain aggrieved and can appeal against the decision of the manager concerned.

3. Stage Three - Appeal

If the complainant is dissatisfied with the outcome at Stage 2 and wishes to take the matter further, they can escalate the complaint to Stage 3 – an Appeal Panel Hearing (see Annexe 3) on completion of an Appeal Panel Hearing Form **within 5 working days** of the written response to Stage Two. This panel will consist of an Appeals Trustee (Vice-Chair with Chair as back up) and two other Trustees. This is the final stage of the complaints procedure.

The Complaints Officer will acknowledge receipt of the Appeal Panel Hearing Form **within five working days** and invite the complainant to attend an Appeal Panel Hearing. The Appeal Panel Hearing will take place **within 10 working days** of the acknowledgement letter. The Complaints Officer will have circulated the Stage 2 report to the panel with any correspondence from the complainant.

The Appeal Panel Hearing will take place at Bullion Hall. The complainant can bring a person to support or to speak for them at the hearing. However, a solicitor acting in a legal capacity cannot attend as the Appeal Hearing is not a legal proceeding.

The complainant should be informed in writing of the panel's decision and any action taken **within 5 working days** of the hearing. The Appeal Panel may uphold the action taken at Stage Two or make any changes/recommendations. The decision of the Appeal Panel is final although this does not prevent the complainant from pursuing the matter further through any appropriate legal proceedings.

There is no further right of appeal. However, **both** parties may agree that there would be some merit in referring the matter to a third party for advice, conciliation, or arbitration. If this is the case, arrangements will be made to find a mutually acceptable third party.

General Notes

1. If the report concludes that the allegation is well founded, the perpetrator will be liable to disciplinary action in accordance with our disciplinary procedure. An employee who receives a formal warning or who is dismissed for harassment/bullying may appeal by using our disciplinary appeal procedure.
2. If you bring a complaint of harassment/bullying, you will not be victimised for having brought the complaint.
3. Accusations of bullying can sometimes be used as a form of bullying. If the report concludes that the complaint is both untrue and has been brought with malicious intent, disciplinary action may be taken against you.
4. All complaints of bullying, whether formal or informal, will be reported to The Trustees at the next board meeting following the complaint. Where appropriate, and depending on circumstance, complaints may be anonymised.

Victim Support

Where appropriate, Integrating will seek to provide additional assistance to victims by contacting outside agencies who will provide specialist advice and support, with the staff member's permission.

Integrating will provide additional support to victims of harassment, until the case is resolved. Wherever possible, Integrating will ensure that staff are available to support victims if they so wish.

Police Involvement

Integrating will report incidents of harassment to the police where there is a clear threat to the safety of staff or the general public or if the allegation is of a serious criminal nature such as rape or sexual or racial assault

Training

Managers will be offered training to learn how to handle any issues should they arise.

Signed:



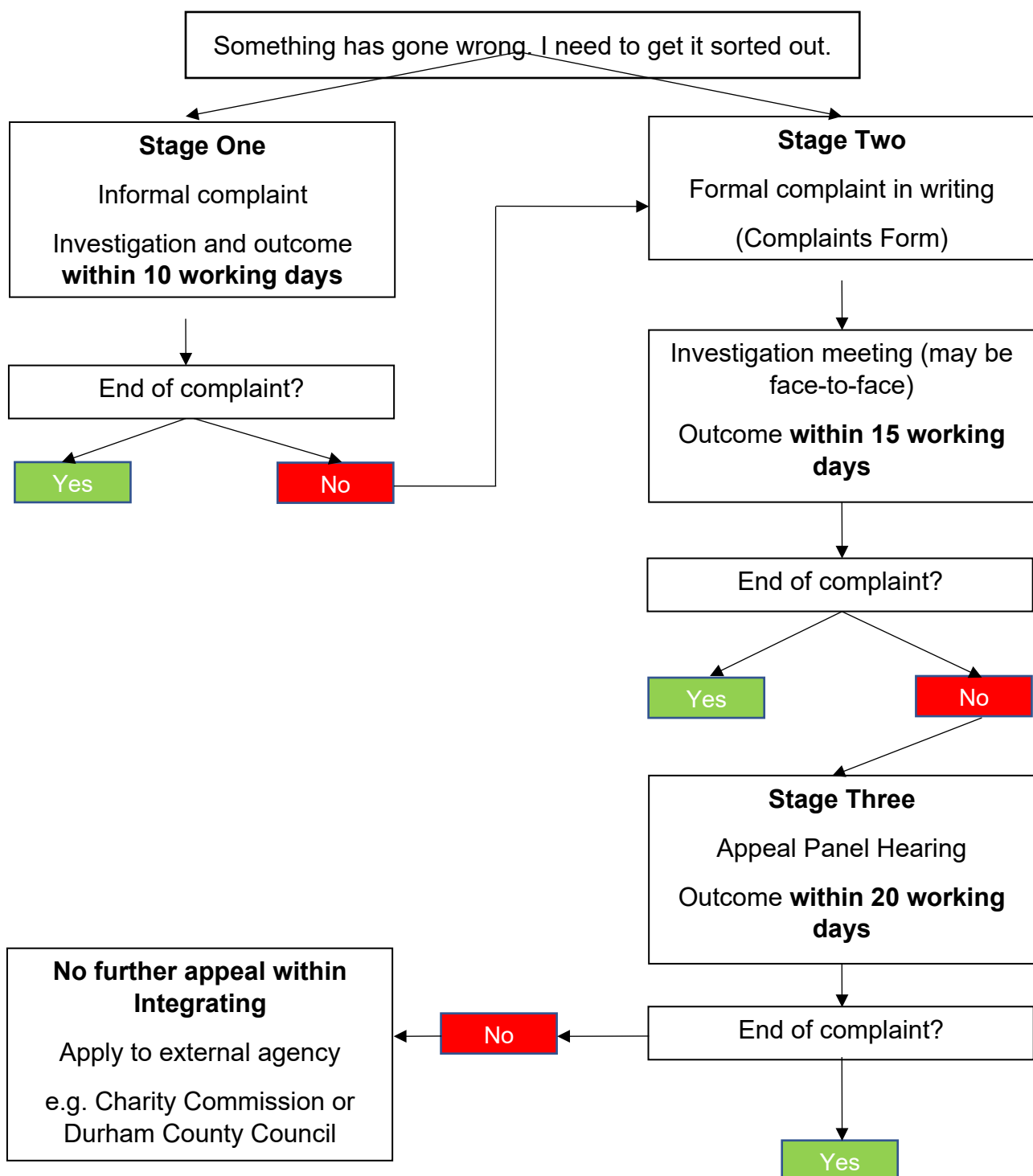
Date: 01.12.25

Review date: 01.11.26

Annex A: Making a complaint procedure

Integrating tries to make its service for children, young people and adults fun, helpful and safe. However, sometimes things go wrong and to make sure this does not happen again, we need to know what has happened and how you feel about so we can do things differently.

Any area of dissatisfaction is a complaint and as such, should be brought to the attention of staff as soon as possible.



Annex B: Formal Complaint Form

Please complete and return to The Business Manager, who will acknowledge receipt and explain what action will be taken.

Your name:	
Member of Integrating's name (if relevant):	
Your relationship to the member of Integrating (if appropriate):	
Address:	
Postcode:	
Daytime telephone:	Evening telephone number
Email address:	
Please give details of your complaint, including whether you have been spoken to anybody at Integrating about it.	
What actions do you feel might resolve the problem at this stage?	

Are you attaching any paperwork? If so, please give details.		
Signature		Date
Official use only		
Date of acknowledgement sent		
Course of action	Investigation ☐	Face-to-face meeting ☐
Meeting date offered		
Meeting date confirmed		

Annex C: Appeal Panel Hearing Request Form

Please complete and return to The Business Manager, who will acknowledge receipt and explain what action will be taken.

Your name:	
Member of Integrating's name (if relevant):	
Your relationship to the member of Integrating (if appropriate):	
Address:	
Postcode:	
Daytime telephone:	Evening telephone number
Email address:	
Please give details of the resolution to your complaint from Stage Two	
How do you feel the outcome needs to change at this stage?	

Are you attaching any paperwork? If so, please give details.			
Signature		Date	
Official use only			
Date of acknowledgement sent			
Appeal Panel Meeting date offered			
Appeal Panel Meeting date confirmed			
Appeal Panel Hearing Trustees			