



Sufra NW London

Anti Bullying and Harassment Policy

Policy Owner:	Deputy Director	To be approved by:	Board of Trustees
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Next Review Date:	May 2027	Review frequency:	Every 2 years

1 Introduction

Sufra NW London is committed to encouraging and maintaining good relations within a working environment which fosters team working and encourages staff and volunteers to give their best. Everyone in the organisation and who has dealings with the organisation has a responsibility to maintain good working relationships and not use words or deeds that may harm the wellbeing of others. 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.

Sufra NW London will not tolerate the bullying and harassment of others; any allegations—whether formal or informal—that either of these have taken place will be taken seriously.

2 Scope

This policy applies to all staff and volunteers working within the organisation, regardless of when and where that is taking place.

3 Definitions and examples

3.1 What is bullying?

Bullying is any behaviour that leaves an individual feeling threatened, intimidated, humiliated, vulnerable or otherwise upset. It does not need to be connected to a protected characteristic.

It can take various forms, from extreme behaviour involving violence and intimidation, through to subtle actions such as deliberate exclusion from the team etc. It can also take place online (cyberbullying).

Constructive and fair feedback about your behaviour or performance from your manager or colleagues is not bullying. It is part of normal employment and management routine and should not be interpreted as anything different.

Examples of bullying include

- 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 (this should be borne in mind where employees are working remotely and are managed by e-mail—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.

3.2 What is harassment?

Harassment is where a person is subject to uninvited conduct violates their dignity, in connection with a protected characteristic policy (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 could be carried out by a colleague or by a third party such as a guest or customer.

We also define harassment as behaviour that creates a hostile, humiliating, degrading or similarly offensive environment in relation to a protected characteristic. Name calling, lewd comments, excluding colleagues, making insensitive jokes, and displaying pornographic material are all examples of harassment.

Physical, verbal and non-verbal conduct can all amount to harassment. So can things you say or do online, especially on social media or using AI eg creating deepfakes.

The impact on the victim is very important. A person's behaviour can amount to bullying or harassment even if they had no idea it would be perceived that way.

Examples of harassment include

- 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 – inappropriate jokes of a sexual nature, unwelcome flirting, sharing sexually explicit images or messages

4 Dealing with bullying and harassment

4.1 What to do if you feel you are being bullied and/or harassed

If you believe you are being bullied and/or harassed you should do the following:

- Tell someone else about it. If you are feeling uncomfortable about a situation and are not sure if it is bullying/harassment, still try to talk to someone such as your Line Manager or another Manager about it;
- Keep a written record of the offending behaviour. Write down the dates, times, and places when events occurred and what was said or done. If anyone else witnessed any of the instances make a note of whom it was;
- If you can, make it clear to the person who is bullying/harassing you that their behaviour is unwelcome and that you want it to stop. In most cases, once the person knows that her/his behaviour is unwelcome, they will stop. You can do this in various ways: alone, with a friend, or by asking your manager to speak to the person;
- If you prefer an informal approach you can ask your line manager to tell the person who is bullying/harassing you that their behaviour is unwelcome and that you want it to stop;
- If the behaviour continues, talk to your manager or representative. You may need to make a formal grievance (see the Grievance Policy); and/or
- If it is your manager or supervisor who is harassing you, speak to their line manager (a member of the Board of Trustees if necessary).

- If a more formal approach is needed, employees can record a grievance which will then be reviewed and investigated if needed.

4.2 Responsibilities of managers

Each manager is obliged to act fully in accordance with this policy at all times. We have a duty of care for our staff, this includes creating a work environment which neither condones nor gives support of any kind to acts of bullying and harassment.

Where a manager becomes aware that bullying or harassment may be taking place but the employee has not complained, the manager should raise it with the employee and offer support and guidance on making it stop and/or making a formal grievance.

Where a manager becomes aware of or receives a grievance about an alleged case of bullying/harassment affecting one of their staff she/he should:

4.2.1 Step 1: Take information

- Try to establish from the employee the nature, seriousness, and impact of the alleged bullying/harassment. Be sympathetic to the complainant at all times.
- Treat the complaint in confidence, as far as possible.
- Consider if the matter should be dealt with formally or informally. If it can be dealt with informally, advise the employee appropriately, for example ask if the employee feels they can raise the issue directly with the other staff member and explain to them how their behaviour made them feel. Record the details of your conversation and save this record on our HR system.
- If the employee does not feel comfortable to address the issue informally, then the matter needs to be dealt in a formal manner using the grievance procedure (see below).
- Sign-post the employee to support such as our Employee Assistance Program or other mental health support.

4.2.2 Step 2: For formal complaints, initiate a grievance process (if appropriate)

- If the employee wants to take a more formal approach. A [grievance form](#) should be completed by the employee that details the details of the grievance and the desired outcomes.
- A meeting should be held with the employee and Manager to discuss this report.

- After the grievance meeting, the manager should consider whether an investigation is needed to ensure all staff involved have a chance to be heard. A neutral third-party investigator may be appropriate.
- If an investigation is needed, determine who should be interviewed including the complainants, the alleged and any witnesses. Also consider if CCTV footage or correspondence (eg email or messages) need to be reviewed. Be objective and avoid making assumptions.

4.2.3 Step 3: Outcomes

- Write a report detailing your findings (explain what has been substantiated, unsubstantiated or partially substantiated)
- Outline outcomes for the behaviour, this could include: a warning being issued (verbal or written), mediation, revoking privileges, role reassignment, suspension, termination of contract, additional training etc. Ensure no retaliation or victimisation occurs.
- Should an investigation be necessary and sanctions applied, this information should be treated as confidential and not disclosed to the individual who raised the complaint.
- Sanctions for staff harassment should be proportionate and consistent. The goal is to both address the behaviour and prevent recurrence.

There may be cases where a manager believes that an employee is being harassed but the employee either denies it or insists that they want no action to be taken about it. In such cases the manager should not pressure the employee to complain or request action. However, the manager should consider other ways in which the particular behaviour or situation can be stopped.

4.3 Guidance to employees

4.3.1 Employees should:

- Be aware of the issue of bullying/harassment, of the forms it can take and of the damage it can do to individuals and organisations;
- Make sure their own conduct does not include behaviour that could possibly constitute bullying/harassment;
- Not be afraid to stand up against bullying and harassment or to support a colleague who is being harassed; and

- Talk in confidence to any employee that you believe is being bullied/harassed. Advise them that they can take the action if necessary. It is possible that the employee may be reluctant to have the matter dealt with formally. If so, be encouraging, but sensitive to their wishes.

5 Procedure

The procedure for raising a complaint—whether informal or formal—about alleged bullying and/or harassment is covered in the Grievance Policy (section **3, Grievance Process**).

6 Consequences of a breach of this policy

If after due investigation we consider that a team member 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. (see, **Disciplinary Policy**)

BOARD APPROVED 04.06.2025

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[END]