
Anti-harassment & Bullying Policy		
Issue Date: 27-Jun-2025	Document #: HR-PL-003	Revision #: V01

Anti-harassment & Bullying Policy

1.0 Introduction

At Connect 2 Cleanrooms Limited (C2C), we are committed to fostering a safe, respectful, and inclusive working environment for everyone. This policy is designed to:

- Promote a culture of dignity and respect, where all individuals feel valued and supported.
- Prevent harassment and bullying by setting clear expectations for behaviour.
- Provide a clear process for reporting and addressing concerns in a fair and timely manner.
- Comply with UK employment law, including the Equality Act 2010 and Health and Safety at Work Act 1974.

We believe that everyone has the right to work in an environment free from intimidation, hostility, or unfair treatment. This policy is part of our broader commitment to employee wellbeing and organisational integrity.

2.0 Scope

This policy applies to all individual working at, or with, C2C, including:

- Permanent and temporary employees
- Contractors and agency staff
- Freelancers and contractors
- Volunteers, interns and apprentices
- Visitors, clients and suppliers interacting with our staff

It covers all work-related settings and activities, including but not limited to:

- The physical workplace (offices, warehouse, cleanrooms, etc.)
- Remote or hybrid working environments
- Work-related travel and off-site meetings
- Company events, training sessions, and social functions
- Digital communications (e.g. email, messaging platforms, video calls)
- Social media interaction where there is a connection to work or colleagues

Harassment or bullying that occurs outside of work but has a direct impact on working relationships or the work environment may also fall under this policy.

This policy is not limited to behaviour between employees – it also applies to interactions with clients, suppliers and other third parties. Everyone has a responsibility to uphold a respectful and inclusive culture, regardless of their role or seniority.

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3.0 Responsibilities

Creating and maintaining a workplace free from harassment and bullying is a shared responsibility. Everyone at C2C has a role to play in up[holding this policy and contributing to a positive working environment.

All employees are expected to:

- Treat colleagues, clients and partners with respect and professionalism at all times.
- Be aware of how their behaviour may affect others, even if unintentionally.
- Speak up if they witness or experience harassment or bullying.
- Support colleagues who may be affected and encourage them to report concerns.
- Co-operate fully with any investigations or informal resolutions.

Managers and leads must:

- Lead by example and model respectful, inclusive behaviour.
- Be proactive in identifying and addressing inappropriate conduct.
- Create an open environment where team members feel safe to raise concerns.
- Take all complaints seriously and act promptly and fairly.
- Maintain confidentiality and impartiality when handling issues.
- Ensure that team members are aware of this policy and understand their responsibilities.

Senior Leadership are responsible for:

- Providing training and resources to support awareness and understanding of this policy.
- Ensuring that all complaints are investigated thoroughly, fairly and in a timely manner.
- Monitoring trends or patterns in complaints to identify areas for improvement.
- Supporting both complainants and respondents throughout the process.
- Taking appropriate disciplinary action where necessary.
- Reviewing and updating this policy regularly to reflect best practice and legal requirements.

4.0 Definitions/Abbreviations

Harassment

Under the Equality Act 2010, harassment is defined as unwanted conduct related to a protected characteristic that:

- Violates a person's dignity, or
- Creates an intimidating, hostile, humiliating or offensive environment for them

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Protected characteristics include:

Age, disability, gender reassignment, race, religion, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.

Harassment can be:

- Verbal (e.g. offensive jokes, slurs or comments)
- Non-verbal (e.g. gestures, facial expressions or body language)
- Written or visual (e.g. emails, posters, social media posts)
- Physical (e.g. unwanted touching or physical intimidation)

It can be a one-off incident or pattern of behaviour, and it does not need to be intentional to be unlawful. What matters is the impact on the person experiencing it.

Bullying

While bullying is not defined in law, it is recognised as offensive, intimidating, malicious or insulting behaviour that undermines, humiliates, or injures the recipient. It may involve:

- Abuse of power or position
- Persistent criticism or exclusion
- Spreading rumours or gossip
- Deliberately undermining someone's work or confidence

Bullying can occur face-to-face, in writing, over the phone or online. It may not be linked to a protected characteristic, but it is still unacceptable and will be treated seriously.

5.0 Referenced Documents

Equality Act 2010

Health and Safety at Work Act 1974

6.0 Policy

C2C operates a strict zero-tolerance policy towards all forms of harassment and bullying. Any such behaviour is unacceptable and will be addressed promptly and seriously, regardless of the role or seniority of those involved.

Examples of Unacceptable Behaviour

The following are examples of behaviour that may constitute harassment or bullying. This list is not exhaustive, but is intended to provide clarity on the types of conduct that are not acceptable at C2C:

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- Making offensive or inappropriate jokes, especially those related to race, gender, disability, or other protected characteristics.
- Repeatedly asking personal questions or making comments about someone's appearance, relationships, or private life.
- Displaying or sharing offensive material (e.g. posters, emails, memes or messages).
- Unwanted physical contact, such as touching, hugging, or invading personal space.
- Mocking or mimicking someone's accent, speech or mannerisms.
- Using slurs, derogatory language or gestures.
- Sending unwelcome messages via email, text or social media.

Bullying

- Shouting at, insulting or belittling a colleague in front of others.
- Persistent criticism or undermining of someone's work without justification.
- Deliberately excluding someone from meetings, communications, or social activities.
- Setting someone up to fail by withholding information or giving unrealistic deadlines.
- Spreading rumours or gossip intended to damage someone's reputation.
- Misusing power or position to intimidate or control others.
- Ignoring or dismissing someone's contributions or ideas repeatedly.

Cyberbullying and Digital Misconduct

- Sending aggressive or threatening messages via email or messaging platforms.
- Publicly criticising or mocking colleagues in group chats or on social media.
- Sharing private or embarrassing information about someone without their consent.
- Using emojis, GIFs or tone in digital communication to intimidate or belittle.

Even if the behaviour is intended as a joke or is not directed at a specific individual, it can still be considered harassment or bullying if it causes offence or distress.

Reporting and Support

C2C encourages anyone who experiences or witnesses any example of harassment or bullying to speak up. We are committed to handling all concerns sensitively, fairly, and without fear of retaliation.

How to Report a Concern

Employees can report concerns in the following ways:

- **Informally:** if you feel comfortable, you may choose to speak directly to the person involved to explain how their behaviour has affected you. Sometimes, this can resolve the issue quickly.

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- **To a Manager:** you can raise your concern with your line manager or another trusted manager, who will listen and help you decide on the next steps.
- **To a member of the Executive Team:** you can contact the Executive team directly, either in person, by phone or via email. They will treat your concern confidentially and guide you through the process.

Anonymous reports may be considered, but they can limit our ability to investigate fully.

What Happens Next

Once a concern is raised:

- **Initial discussion:** A manager will meet with you to understand the issue and discuss possible options.
- **Informal resolution:** Where appropriate, we may suggest mediation or a facilitated conversation to resolve the issue without formal action.
- **Formal investigation:** if the matter is serious or cannot be resolved informally, a formal investigation will be conducted. This may involve interviews and reviewing relevant evidence.
- **Outcome and action:** if the complaint is upheld, appropriate action will be taken, which may include disciplinary measures.

We aim to complete investigations promptly and will keep all parties informed through the process.

Support Available

- Confidential support is available for anyone affected by harassment or bullying.
- Employee assistance programme (EAP) – free, confidential counselling and support services are available to all staff via the Westfield Health portal.

No Retaliation

C2C will not tolerate retaliation against anyone who raises a concern in good faith. Any such behaviour will be treated as a serious disciplinary matter.

Consequences

C2C takes all allegations of harassment and bullying seriously. Any employee found to have breached this policy – whether through direct actions, enabling behaviour or failure to act – may be subject to disciplinary action.

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Possible Outcomes

Depending on the severity and nature of the behaviour, outcomes may include:

- A formal verbal or written warning.
- Mandatory training or coaching on appropriate workplace behaviour.
- Mediation or facilitated discussions to rebuild working relationships.
- Reassignment of duties or changes to reporting lines.
- Suspension (with or without pay) during or after investigation.
- Demotion or loss of responsibilities.
- Termination of employment in cases of serious or repeated misconduct.

Factors Considered

When determining the appropriate response, C2C will consider:

- The seriousness and impact of the behaviour.
- Whether it was a one-off incident or part of a pattern.
- The intent behind the behaviour (though impact remains the priority).
- The response of the individual when the issue was raised.
- Any previous conduct or disciplinary history.

False or Malicious Allegations

While we encourage all employees to speak up, knowingly making a false or malicious complaint is a serious matter and may also result in disciplinary action. However, no action will be taken against anyone who raises a concern in good faith, even if it is not upheld.

Review

C2C is committed to keeping this policy relevant, effective and aligned with best practices and legal requirements.

Policy Review Process

- This policy will be reviewed annually by the Executive Team in consultation with other senior leaders.
- It will also be reviewed immediately following any significant incident, legal update or organisational change that may impact its relevance or effectiveness.
- Feedback from employees, managers and other stakeholders will be considered as part of the review process.

Employee Awareness

- All employees will be notified of any updates or changes to this policy.

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- Updated versions will be made available via Staff Circle and the Team Guidebook.
- Refresher training or briefings may be provided to ensure continued awareness and understanding.

By regularly reviewing and updating this policy, we aim to ensure that C2C remains a safe, respectful and inclusive place for everyone.

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7.0 Approval & Revision History

	Name	Job Title	Signature	Date
Author	Nicola Coull	Managing Director		27-Jun-2025
Reviewer	N/A	N/A	N/A	N/A
Approval	Simon Rice	Compliance Manager		27-Jun-2025

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