ANTI-HARASSMENT AND BULLYING POLICY

AUGUST 2026

1. OUR COMMITMENT

We have a **zero-tolerance** approach to bullying and harassment and are committed to creating a safe and supportive environment for everyone who works with us, including colleagues, agency workers, contractors, volunteers and visitors. We expect all colleagues to treat one another with dignity and respect.

Any behaviour that breaches this policy may lead to disciplinary action up to and including termination. We will always take allegations seriously and act decisively.

2. REFERENCES TO OTHER POLICIES

- We have a separate **Sexual Harassment Policy** that covers behaviours of a sexual nature. This policy should be read in conjunction with that policy.
- We also have a Disciplinary Policy and Grievance Policy which you should consult as needed.

3. SCOPE

This policy applies both at work and outside the workplace where work-related activities take place, such as business trips, client meetings, social events or work functions. It covers behaviour by colleagues (including consultants, contractors and agency workers), as well as third parties like customers, suppliers or visitors.

For clarity, this policy doesn't form part of your contract of employment, and we may make changes to it if needed.

4.WHAT DO WE MEAN BY HARASSMENT?

Harassment is any unwanted behaviour, physical, verbal or non-verbal that makes someone feel uncomfortable, disrespected, humiliated, intimidated or offended. Even a single incident can count as harassment.

It can also mean treating someone less favourably because they did (or did not) go along with such behaviour in the past.

Harassment may be unlawful if it relates to a **protected characteristic**, which under the Equality Act 2010 includes:

- age; disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

It can also include behaviour of a sexual nature (sexual harassment). However, even if behaviour doesn't fall under one of these protected categories, it can still be unacceptable harassment.

4.1 Examples of harassment include:

- unwanted physical contact (touching, pushing, pinching, grabbing),
- unwelcome sexual advances or suggestive comments (even if the person thinks they're harmless),
- offensive emails, texts, or social media posts,
- mocking, mimicking or belittling someone's disability.

You don't have to be the direct target to be affected. For example, hearing racist jokes about another ethnic group could still create an offensive environment for you.

For more information on harassment, please click here ACAS Harassment and Discrimination at Work

5. WHAT DO WE MEAN BY BULLYING?

Bullying is behaviour that is offensive, intimidating, malicious or insulting, and misuses power in a way that makes someone feel vulnerable, upset, humiliated, undermined or threatened.
Power doesn't just mean job title; it can include influence, strength, or other forms of leverage.

5.1 Examples of bullying include:

- physical or psychological threats,
- overbearing or excessive supervision,
- unfair or derogatory comments about someone's work.

Reasonable feedback, constructive criticism, or clear instructions given in the course of work are **not** bullying.

6. IF YOU EXPERIENCE HARASSMENT OR BULLYING

If you feel able, you can try addressing the issue directly by telling the colleague their behaviour is unwelcome and that it needs to stop.
Sometimes people don't realise the impact of their actions. If that feels too difficult, or if their behaviour continues, please speak to your line manager as they can offer confidential advice and may be able to help resolve matters informally on your behalf.

If informal steps don't work or aren't appropriate, you can raise the issue formally under our Grievance Policy. The People Services team will ensure any complaint is investigated fairly, promptly, and with confidentiality.

Wherever possible, the investigation will be handled by someone with relevant experience who has had no prior involvement. Only those who need to know will be given information. During the process, we'll consider whether temporary steps are needed to help manage working relationships between you and the colleague involved.

Once the investigation is complete, the People Services team will communicate the outcome in writing to you, the potential outcomes are listed below.

- If the complaint is upheld and involves a colleague, it will be dealt with under our Disciplinary Procedure and may amount to misconduct or gross misconduct.
- If the person responsible is a third party (customer, visitor, supplier etc.), we will decide what action is appropriate.
- Regardless of the outcome, we'll consider how best to support you and manage any ongoing working relationship.

7. PROTECTION AND SUPPORT

We want you to feel safe speaking up. Any colleague who makes a complaint, or helps with an investigation in good faith, must not be treated badly, victimised, or retaliated against.

If someone does retaliate or victimise a colleague in this way, they will face disciplinary action under our Disciplinary Policy.

We also offer 24/7 access to confidential counselling via our Employee Assistance Programme on **0800 7560861** – quote **'Perkbox'** and **'Watson Fuels'**.

8. POLICY REVIEW

This policy does not form part of any employee's contract of employment and may be amended, updated, or withdrawn by the Company at any time.

9. DATA PROTECTION

We process any personal data collected in relation to this policy in accordance with our data protection policy. We will record only the personal information required and keep the information only for as long as necessary.

10. WHERE CAN I GET FURTHER INFORMATION

For further information, please contact the People Services team on peopleservices@watsonfuels.co.uk or click here ACAS Discrimination and Bullying.

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