Statement

In line with the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023, as well as the update in the Employment Rights Act 2025 to include protected disclosures;
Universal Support Services Group (USSG) Ltd (the company' and/or 'USSG') is committed to providing all employees with a healthy and safe work environment. USSG will ensure that procedures exist to allow complaints of bullying and/or harassment to be dealt with and resolved within the company, without limiting any person's entitlement to pursue resolution of their complaint with the relevant statutory authority. USSG is committed to the elimination of all forms of bullying and/or harassment.

This policy applies to all employees at the company, however employed. It applies during normal working hours, at work related or sponsored functions, and while traveling on work related business. There will be no recriminations for anyone who in good faith alleges bullying and/or harassment.

Definitions

Harassment is 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.
Bullying is unwelcome or unreasonable behavior that demeans, intimidates, or humiliates people either as individuals or as a group. Bullying behavior is often persistent and part of a pattern, but it can also occur as a single incident. It is usually carried out by an individual but can also be an aspect of group behavior (see "mobbing" below).

Some examples of bullying and/or harassment behavior are:
Verbal communication

- Abusive and offensive language
- Insults & Teasing
- Spreading rumor and innuendo
- Unreasonable criticism
- Trivializing of work and achievements

Manipulating the work environment

- Isolating people from normal work interaction
- Excessive demands and/or setting impossible deadlines

Psychological manipulation

- Unfairly blaming for mistakes
- Setting people up for failure
- Deliberate exclusion
- Excessive supervision
- Practical jokes
- Belittling or disregarding opinions or suggestions
- Criticising in public

As well as forms of physically offensive and/or abusive behavior and acts.

Bullying and harassment are not necessarily face to face, they may be by written communications, visual images (e.g.; pictures of a *sexual nature or embarrassing photographs of colleagues), e-mail (so called 'flame-mail') & the telephone, etc.

Context is important in understanding bullying, particularly verbal communication. There is a difference between friendly insults exchanged by long-time work colleagues and comments that are meant to be, or are taken as, demeaning. While care should be exercised, particularly if a person is reporting alleged bullying as a witness, it is better to be genuinely mistaken than to let actual bullying go unreported.

Mobbing

Mobbing is a particular type of bullying behavior carried out by a group rather than by an individual. Mobbing is the bullying or social isolation of a person through collective unjustified accusations, humiliation, general harassment, or emotional abuse. Although it is group behavior, specific incidents such as an insult or a practical joke may be carried out by an individual as part of mobbing behavior.

Consequences of Bullying

Bullying is unacceptable behavior because it breaches principles of equality and fairness, and it frequently represents an abuse of power and authority. It also has potential consequences for everyone involved.

For those being bullied

People who have been bullied often suffer from a range of stress-related illnesses. They can lose confidence and withdraw from contact with people outside the workplace as well as at work. Their work performance can suffer, and they are at increased risk of workplace injury.

For the employer

Besides potential legal liabilities, the employer can also suffer as bullying can lead to:

- Deterioration in the quality of work
- Increased absenteeism
- Lack of communication and teamwork
- Lack of confidence in the employer leading to lack of commitment to the job
- Damage to the company's reputation

For others at the workplace

People who witness bullying behaviors can also have their attitudes and work performance affected. They can suffer from feelings of guilt that they did nothing to stop the bullying, and they can become intimidated and perform less efficiently fearing that they may be the next to be bullied. Or also feel harassed themselves as witnessing bullying and/or harassment behavior can create an offensive work environment.

Responsibilities

Managers and supervisors

- Ensure that all employees are aware of this policy and procedures herein
- Ensure that any incident of bullying is dealt with regardless of whether a complaint of bullying has been received
- Provide leadership and role-modeling in appropriate professional behavior
- Respond promptly, sensitively, and confidentially to all situations where bullying behavior is observed or alleged to have occurred Employees
- Be familiar with and behave according to this policy
- If you are a witness to bullying, report incidents to your Supervisor, Head of Dept or Company Director as appropriate
- Where appropriate, speak to the alleged bully(ies) to object to the behavior

IF YOU THINK YOU HAVE BEEN BULLIED

- Any employee who feels he or she has been victimized by bullying is encouraged to report the matter to his or her Supervisor, or Supervisor, Head of Dept or Company Director as appropriate
- Where appropriate, an investigation will be undertaken, and disciplinary measures will be taken, as necessary.

***Addendums to our Sexual Harassment Policy**

As per legislation passed to take effect from October 2024, all members of staff are entitled to be treated with dignity and respect in our place of work. This means freedom from sexual harassment, feeling safe and supported and having access to redress if such behaviour does arise.

Sexual harassment takes many forms, but whatever form it takes it is unlawful under the Equality Act 2010 (EqA) as amended. We will not tolerate it.

The law requires employers to take reasonable steps to prevent sexual harassment of their workers. We take action to prevent sexual harassment from occurring and have clear reporting procedures for our staff to make a complaint about sexual harassment. If you have been sexually harassed, or you have witnessed sexual harassment, we encourage you to tell us so that we can deal with the matter swiftly.

Our Managing Director, Mr Ali Arain, has overall responsibility for the operation of this policy but may delegate elements of implementation or decision-making to our HR Director. Our Management Team will maintain an open-door policy and we encourage all staff to come forward with any concerns in relation to sexual harassment. All our staff have a responsibility to behave in line with the requirements of this policy.

Instances of sexual harassment or victimisation may lead to disciplinary action up to, and including, termination of employment.

This policy is reviewed regularly to ensure it remains up to date and in order to monitor its effectiveness. Any changes required will be implemented and communicated to our workforce.

Scope

We deplore all forms of sexual harassment and seek to ensure that the working environment is safe and supportive to all those who work for us. This includes employees, workers, agency workers, volunteers and contractors in all areas of our Organisation, including any overseas sites.

Definitions

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, an agent of an organisation, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (e.g. WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour. Examples of sexual harassment include, but are not limited to:

- sexual comments or jokes, which may be referred to as “banter”
- displaying sexually graphic pictures, posters or photos
- suggestive looks, staring or leering • propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person’s private or sex life or a person discussing their own sex life
- sexual posts or contact in online communications, including on social media
- spreading sexual rumours about a person
- sending sexually explicit emails, text messages or messages via other social media
- unwelcome touching, hugging, massaging or kissing

Victimisation is subjecting someone to detriment because they have done, are suspected of doing or intend to do, an act which is protected under discrimination and harassment laws. These are outlined below. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation.

The protected acts are:

- making a claim or complaint under the EqA (e.g. for discrimination or harassment)
- helping someone else to make a claim by giving evidence or information in connection with proceedings under the EqA
- making an allegation that someone has breached the EqA
- doing anything else in connection with the EqA.

Examples of victimisation may include:

- failing to consider someone for promotion because they have previously made a sexual harassment complaint
- dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint
- excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

Circumstances which are covered

This policy covers behaviour which occurs in the following situations:

- a work situation
- a situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch, a business trip or social functions
- outside of a work situation but involving a colleague or other person connected to the Organisation, including on social media
- against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role.

What to do if you are subject to sexual harassment or victimisation

We are committed to ensuring that there is no sexual harassment or victimisation in our workplace. Allegations of sexual harassment and victimisation will be treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of our disciplinary procedures, a copy of which is available from [insert name or job title, e.g. senior manager].

Informal complaint

We recognise that complaints of sexual harassment or victimisation can be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances, you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

If you experience sexual harassment and you feel comfortable to do so, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

In addition, you may also choose to raise concerns during your regular communication with your manager, e.g. in a one-to-one meeting. Your manager will listen to you and take your concerns seriously if you do this but may encourage you to follow the reporting procedures set out below. If you don't have a one-to-one meeting scheduled with your manager, you can ask to meet with them to discuss any concerns that you may have.

Formal complaint

Where the informal approach fails or if the sexual harassment or victimisation is more serious, you should bring the matter to the attention of HR Department as a formal written complaint and again your confidential helper can assist you in this.

Alternatively, you can report instances by emailing our HR Dept directly. If possible, you should keep notes of what happened so that the written complaint can include:

- the name of the alleged harasser and dates and times when the alleged harassment occurred
- the nature of the alleged harassment and any action already taken by you to stop the alleged harassment.
- the names of any witnesses

On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. The meeting will normally be held within five working days of receipt of your complaint. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence may be dealt with under the disciplinary procedure.

On conclusion of the investigation, which will normally be within 10 working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator. If you wish to appeal, you must inform our Managing Director in writing within five working days of receiving the outcome. You will then be invited to a further meeting. As far as reasonably practicable, the Organisation will be represented by a more senior manager than the manager who attended the first meeting (unless most senior managers attended that meeting).

Following the appeal meeting, you will be informed of the final decision, normally within 10 working days, which will be confirmed in writing.

Regardless of the outcome of the procedure, we are committed to providing the support you may need. This may involve mediation between you and the other party or some other measure to manage the ongoing working relationship.

You will not be victimised for having made a complaint.

What to do if you witness sexual harassment or victimisation

If you witness sexual harassment or victimisation, you are encouraged to take appropriate action to address it. You should not take any action that may put you at risk of sexual harassment or other harm. If you feel able, you should intervene to prevent the matter continuing. If you are not able to do this, your action may include offering support to the person who has been sexually harassed and encouraging them to report the incident or reporting the incident yourself.

If reporting the incident, you should bring the matter to the attention of the HR Department in writing. Alternatively, you can report instances of sexual harassment by emailing [insert email address, e.g. a central non-personalised email address, possibly one set up especially for this purpose] or by visiting [insert details of intranet portal or other online means in your organisation and how complaints can be registered]. Our online means of reporting sexual harassment are continually monitored.

Your concerns will be handled by the appropriate Senior Manager who will sensitively talk to the person subject to sexual harassment to determine how they want the matter to be handled.

Third-party sexual harassment

Third-party sexual harassment occurs when a member of our workforce is subjected to sexual harassment by someone who is not part of our workforce but who is encountered in connection with work.

This includes our customers, suppliers, members of the public, stakeholders, friends and family of colleagues, delegates at a conference, audiences, self-employed contractors, etc.

Third-party sexual harassment of our workforce is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties and we are committed to doing so.

The law does not provide a mechanism for individuals to bring a claim of third-party harassment alone. However, failure for an employer to take reasonable steps to prevent third-party sexual harassment may result in legal liability in other types of claims.

In order to prevent third-party sexual harassment from occurring, we will appropriately:

- make all interested parties aware of this policy and our zero tolerance
- attach signage to the walls of the areas within the workplace where customers are present to warn that sexual harassment of our staff is not acceptable

- inform third parties (i.e. suppliers) of our zero-tolerance sexual harassment policy within our supplier documentation
- inform customers by recorded message at the beginning of telephone calls of our zero-tolerance policy on sexual harassment.

If you have been subjected to third-party sexual harassment, you are encouraged to report this as soon as possible to our Management Team and HR Department. Alternatively, you can report instances of third-party sexual harassment by emailing our HR Department directly.

Should a customer sexually harass a member of our workforce, we will take the appropriate action/s not exhaustive to; warn the client or customer about their behaviour, ban the customer, share information relating to the incident with our other offices/branches, etc.]. Any criminal acts will be reported to the police.

We will not tolerate sexual harassment by any member of our workforce against a third party. Instances of sexual harassment of this kind may lead to disciplinary action, including termination of employment.

Disciplinary action

If the decision is that the allegation of sexual harassment or victimisation is well founded, the harasser/victimiser will be liable to disciplinary action in accordance with our disciplinary procedure up to, and including, summary dismissal. An employee who receives a formal warning or who is dismissed for sexual harassment/victimisation may appeal by using our disciplinary appeal procedure.

When deciding on the level of disciplinary sanction to be applied, we will take into consideration any aggravating factors affecting the case. One example of aggravating factors is an abuse of power over a more junior colleague.

If, due to the investigation, it is concluded that your complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

Training

- We provide training to all our staff on sexual harassment to ensure there is a clear understanding of:
- what sexual harassment is, how it may occur and that it will not be tolerated
- expected levels of behaviour
- how they can report any incidents of having been sexually harassed or having witnessed it
- how acts of harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal.

We ensure that all levels of management are trained on implementing this policy, including preventing and managing sexual harassment in the workplace and the procedure to follow if an allegation is reported.

We will regularly review the effectiveness of our training and provide refresher training as appropriate.

Aims

The aim of this policy is to prevent all forms of bullying and harassment behaviour, whether physical or mental, and ensure a safe and non-threatening environment.

To provide staff, management committee, volunteers and service users who believe they have been subject to harassment and/or discrimination with a means to have their complaint heard, addressed and to deal with those who are accused of breaching this policy.

Action to prevent bullying and harassment behaviours

All existing and new staff:

- shall be made aware of this policy as part of their induction training,
- may be involved in the review process of this policy
- will receive any amendments to the policy,
- will receive training surrounding the policy upon request

All team leaders may receive training to raise awareness so that they are informed and understand how bullying and harassment behaviours could take place and what can be done to reduce the risk of this occurring

It is the responsibility of all staff, management committee members, volunteer, and service users not to practice or encourage any form of behaviour which may be viewed as harassment.

Action will be taken seriously.
All complaints will be dealt with in a fair, confidential, and sympathetic manner. All allegations of harassment be taken seriously.

If an employee wants to report an incident, they should follow the company's Grievance Procedure (USSG Employee Handbook).

Policy and Procedure.

- All incidents of harassment must be reported to the Line Manager, HR Dept &/or Company Directors.
  If the alleged perpetrator is either of the above people, then incidents should be reported to Management not involved in the case, or the complainant should make the complaint known to pertinent USSG Management staff by other means.
- Any person reporting incidents of harassment has the right to have another person present, as does any person accused of harassment. This could be a friend, relative, work colleague or trade union representative.
- The person being harassed must keep a diary of incidents so that these can be recalled accurately at any enquiry or tribunal. Violent incidents or near incidents should be noted on the electronic timesheets and noted on covering email, to be followed up by the Line Manager. Physically violent incidents should be recorded in the company's Accident Book.
- Where the perpetrator is a member of the public and a member of staff is being harassed, staff will be offered support through supervision in reporting the incident to the police.
- Where the perpetrator is a staff member, the incident may be treated as a disciplinary offence; the disciplinary panel of Company Directors &/or Management may decide to suspend her/him with pay whilst investigations are carried out. Please refer to the Disciplinary Policy and Procedure in the company's Employee Handbook.
- A panel of Company Directors &/or Management will be formed to deal with all allegations and/or incidents of harassment. This group must meet within 10 workdays of the incident being reported. If the perpetrator is a staff member the company's disciplinary process must be initiated if the allegations are confirmed. The company must keep all people involved informed of their actions.
- For all communications aligned and/or associated with protected disclosures, this policy is concurrent with our company's Whistleblowing policy (in the company's Employee Handbook) and advising therein.

The Company must:

- investigate the allegation of harassment & agree a course of action to establish the facts
- offer the victim of harassment support
- advise the alleged perpetrator that the allegation has been made within 5 days
- decide on the action to be taken if the allegation is proven, this may involve invoking the disciplinary process
- decide on the action to be taken if the allegation is not proven, this may involve invoking the disciplinary process

The Managing Director shall review this policy annually and/or following significant changes.
This Policy document has been approved by the USSG Managing Director

Mr M M Rashid Baig

Mr M M Rashi Baig - Managing Director
This policy is reviewed as per the Header