



# Bullying, Harassment, and Sexual Harassment Policy

OWNER  
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Board of Directors  
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5

## Introduction

Red Sky Group is committed to providing a work environment that is free from bullying and harassment for all staff, candidates, and clients. We believe that everyone deserves to be treated with dignity and respect.

This policy defines bullying and harassment, outlines how to report it, and details the consequences of engaging in such behaviour.

## What is Bullying and Harassment?

Bullying and harassment are unacceptable behaviours that can create a hostile work environment. Here are some examples:

- Verbal abuse: Shouting, swearing, name-calling, insults, threats.
- Non-verbal abuse: Intimidation, menacing behaviour, offensive gestures.
- Exclusion: Deliberately leaving someone out of conversations or activities.
- Overloading work: Assigning unreasonable workloads or deadlines.
- Undermining work: Criticising someone's work unfairly or constantly.
- Unwanted sexual advances: Physical or verbal advances of a sexual nature.
- Discrimination: Making offensive comments or treating someone differently based on race, religion, gender, sexual orientation, disability, or any other protected characteristic.

This list is not exhaustive. Any behaviour that makes someone feel unsafe, uncomfortable, or humiliated can be considered bullying or harassment.

## What is Sexual Harassment?

Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or effect of:

1. **Violating the victim's dignity**, or
2. **Creating an environment that is intimidating, hostile, degrading, humiliating, or offensive** to the victim.

An individual of any gender may be the victim of sexual harassment.

## Examples of Sexual Harassment (Non-Exhaustive List):

- Unwanted sexual advances or slurs
- Visual conduct such as derogatory or sexually oriented posters

- Physical conduct such as assault, unwanted touching, or any interference based on sex, race, or any other protected characteristic
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss
- Offers of employment benefits in return for sexual favours
- Sexual comments or jokes
- Unwelcome touching, hugging, massaging, or kissing

### **Reporting a Complaint**

If you feel you are being bullied or harassed, including sexually harassed, you can report it to any of the following:

- Your line manager (if you are an internal employee)
- Your Red Sky recruiter or appointed contact (if you are an agency worker)
- A member of the HR team
- Clare Hennessy / Mark Jordan (Managing Directors)

All reports will be treated confidentially and investigated thoroughly. You will not be penalised for raising a complaint in good faith.

### **Complaint Procedure**

- **Informal Resolution:** We encourage employees to try and resolve issues informally with the person accused of bullying or harassment.
- **Formal Complaint:** If an informal resolution is not possible, a formal complaint will be lodged. This will involve a detailed investigation and a meeting with the accused to discuss the allegations.
- **Disciplinary Action:** If the allegations are found to be substantiated, disciplinary action will be taken, which may include warnings, dismissal, or termination of contracts with clients or candidates found to be engaging in bullying or harassment.

### **Support**

We understand that experiencing bullying or harassment can be stressful. We can support anyone who needs it, including access to counselling services.

**Commitment**

Red Sky is committed to creating a positive work environment for all. We will take all reasonable steps to prevent bullying and harassment and to deal with any complaints effectively.

**Sexual Harassment Compliance and Safeguarding**

- Red Sky Group is committed to ensuring all reasonable steps are taken to prevent sexual harassment under the Equality Act 2010, as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023.
- Where an incident or complaint of sexual harassment relates to a temporary agency worker, Red Sky will not carry out instructions from a hirer or intermediary that it considers could amount to sexual harassment or victimisation.
- Red Sky will ensure that all employees and agency workers are provided with regular training on sexual harassment.
- Red Sky will carry out due diligence checks on hirers/intermediaries to ensure that they are taking reasonable steps to carry out their duties as employers under the Equality Act 2010.

**Disciplinary Action for Harassment or Sexual Harassment**

1. Any employee found responsible for bullying, harassment, or sexual harassment will face disciplinary procedures, which may result in dismissal.
2. Any agency worker found responsible for bullying, harassment, or sexual harassment will be subject to Red Sky's complaints procedure, even if such incidents involve individuals who are not engaged by Red Sky.

**Monitoring and Complaints Process**

Red Sky Group has procedures for monitoring compliance with this policy and for dealing with complaints of bullying, harassment, and sexual harassment. All complaints will be investigated fully.

**Further Information**

For more information on bullying and harassment, you can refer to the following resources:

- Advisory, Conciliation and Arbitration Service (ACAS)

**Policy Review**

This policy will be reviewed regularly to ensure it remains effective.