



Anti-Harassment and Bullying Policy

Applicable Legislation Equality Act 2010.

Purpose

GCG is committed to providing an environment free from harassment and bullying and ensuring that all employees, volunteers and users are treated, and treat others, with dignity and respect.

Scope

This policy covers harassment and bullying which takes place within and outside of the centre, including in Board meetings, social functions or events.

This policy applies to all volunteers and users. It also covers harassment and bullying by third parties, such as contractors or visitors to the premises.

Definitions

It is unlawful to harass a person because of their age, race, colour or nationality, ethnic or national origins, sex, gender reassignment, sexual orientation, disability, religion or belief (the Protected Characteristics).

Regardless of intention, harassment is any:

- a. unwanted conduct related to a Protected Characteristic, and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them; or
- b. unwanted conduct of a sexual nature and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them; or
- c. less favourable treatment because of the rejection of or the submission to such harassing behaviour.

Harassment can arise in some cases even though the person complaining does not actually possess a Protected Characteristic but is perceived to have it or associates with other people who possess a Protected Characteristic. A person may also be



to harassment even if they were not the intended target. Examples of harassment include, but are not limited to:

- a. use of insults or slurs based on a Protected Characteristic or of a sexual nature or other verbal abuse or derogatory, offensive or stereotyping jokes or remarks.
- b. physical or verbal abuse, threatening or intimidating behaviour because of a Protected

Characteristic or behaviour of a sexual nature.

- c. unwelcome physical contact including touching, hugging, kissing, pinching or patting, brushing past, invading personal space, pushing grabbing or other assaults.
- d. mocking, mimicking or belittling a person's disability, appearance, accent or other personal characteristics.
- e. offensive or intimidating gestures or comments (regardless of if they were made in person, over emails, text messages or in social media content).
- f. unwelcome requests for sexual acts or favours, verbal sexual advances, vulgar, sexual, suggestive or explicit comments or behaviour.
- g. repeated requests, either explicitly or implicitly, for dates.
- h. repeated requests for social contact or after it has been made clear that requests are unwelcome.
- i. comments about body parts or sexual preference.
- j. displaying or distributing offensive or explicit pictures, items or materials relating to a Protected

Characteristic or of a sexual nature.

- k. shunning or ostracising someone, for example, by deliberately excluding them from conversations or activities.
- l. 'outing' or threatening to 'out' someone's sexual orientation.
- m. explicit or implicit suggestions that employment status or progression is related to toleration of, or acquiescence to sexual advances, or other behaviour amounting to harassment.

Other important points to note about harassment:

- a. a single incident can amount to harassment.



- b. behaviour that has continued for a long period without complaint can amount to harassment.
- c. it is not necessary for an individual to intend to harass someone for their behaviour to amount to harassment.
- d. it is not necessary for an individual to communicate that behaviour is unwelcome before it amounts to harassment; and
- e. the burden is on everyone to be certain that their behaviour and conduct is appropriate and is not unwanted and, in the case of doubt, you must refrain from such conduct.

Bullying is any behaviour, be it physical, verbal or non-verbal, that is offensive, intimidating, malicious or insulting and that involves a misuse of power (e.g. a position of authority or physical strength), which can result in a person feeling vulnerable, upset, humiliated, undermined or threatened.

Examples of bullying include, but are not limited to:

- a. inappropriate and/or derogatory remarks about a person's performance.
- b. physical or psychological threats.
- c. overbearing and intimidating levels of supervision; and
- d. abuse of authority or power by those in positions of seniority.

On their own, any reasonable, legitimate and constructive criticism or comments of a person's performance or behaviour, or reasonable instructions will not amount to bullying.

Procedures

If you are being bullied or harassed, consider if you feel able to raise the problem informally with the person responsible. Clearly explain to them that their behaviour is unwanted and makes you feel uncomfortable. If you cannot speak to the responsible person (for example, because it is too difficult or embarrassing), speak to a manager, or a member of the Board who will endeavour to assist in resolving the issue informally.



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