

## **Dignity At Work Policy**

**This policy sets out our approach to complaints of bullying or harassment, the steps we will take to investigate and deal with such complaints, and how we support those affected.**

# Dignity At Work Policy

## Introduction

At Amey, having a diverse, equitable, and inclusive culture is at the heart of our shared values. All staff members have the right to be treated with respect and dignity and to work in an environment that is fair, inclusive, and free from harassment, bullying, and intimidation. Bullying or harassment in any form cannot and will not be tolerated. This policy is designed to complement our Inclusion Policy and must be read in conjunction with our statement on our zero tolerance to sexual harassment.

## Scope

This policy, together with the associated processes, sets our approach to managing complaints of bullying or harassment and explains the processes that must be followed.

It applies to all permanent, temporary, and fixed-term employees, agency workers, contractors, and people engaged by our suppliers.

This policy does not form part of your employment contract, and it may be amended at any time without consultation.

## Definitions

### Protected Characteristics

The Equality Act 2010 sets out nine protected characteristics from unlawful discrimination. These are:-

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

To be protected from gender reassignment discrimination, you do not need to have undergone any medical treatment or surgery to change from your birth sex to your preferred gender.

Although pregnancy, maternity, gender identity, marriage, and civil partnership are not explicitly protected under the legal provisions on harassment, we consider harassment on any ground to be unacceptable.

### Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Harassment can occur when someone perceives another person to have a protected characteristic, for example, a perception that someone is transgender even if they are not.

Harassment can also arise through association, where someone is harassed because they are associated with someone with a protected characteristic, for example, having a family member of a particular religion.

### Sexual Harassment

The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment; or

- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

## Bullying

Bullying is regarded as conduct that is offensive, intimidating, malicious, insulting or an abuse or misuse of power. It is usually persistent and can undermine, humiliate or injure the recipient. Bullying can be physical, verbal, or nonverbal. It is not necessarily face-to-face and can be done by email, phone calls, online (cyber-bullying), or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and will be unlawful.

It is essential to understand that legitimate, reasonable, and constructive criticism of a person's performance or behaviour or reasonable instructions given to people, delivered professionally and appropriately, in the course of their employment will not amount to bullying.

## Microaggressions

Microaggressions are statements, actions, or incidents regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group, such as a racial or ethnic minority.

Microaggressions generally take one of three forms:

- **Micro-assaults:** Conscious and obvious verbal or non-verbal insults made to a marginalised individual or group, for example, directing limp-wristed hand gestures towards a gay colleague and saying, "It's just a joke".
- **Micro-insults:** Unintentionally insensitive remarks or assumptions based on stereotypes, for example, saying to a person with a disability, "You don't look disabled to me".
- **Micro-invalidations:** Where a person denies or seeks to cancel the feelings and lived experiences of a marginalised individual or group, for example, a white person saying, "I don't think the UK has a problem with racism - some people are just too sensitive".

Serious microaggressions can amount to unlawful harassment, bullying or discrimination, but even less severe microaggressions can negatively impact the health and well-being of the person experiencing them.

## Victimisation

Victimisation is defined as unfavourable treatment, specifically because of an individual making a claim or complaint of discrimination or harassment.

## Principles

### Our Commitment to You

- We believe that a culture of equality, diversity, and inclusion benefits our organisation, supports well-being, and enables our people to work better because they can be themselves and feel they belong.
- We are committed to proactive measures to prevent bullying and harassment (including sexual harassment) to protect staff members.
- We promote a working environment based on dignity, trust, and respect and free from discrimination, harassment, bullying, or victimisation. A toxic workplace culture, where bullying or harassment is tolerated, harms the well-being of the workforce and the broader organisation.

- We will create a working environment where all employees are valued and respected for their unique contribution to the business and are not subject to inappropriate or unwanted behaviour by colleagues or third parties, such as customers, clients, or suppliers.
- We have a zero-tolerance approach to instances of bullying or harassment, whether carried out by colleagues to peers, by one group to another individual member, by a manager to an employee, by an employee to a manager, or by an employee of a third party, for example, a customer, client, or supplier.
- Any complaint made under this policy will be taken seriously and treated sensitively. You can speak to an appropriate manager or contact our Employee Assistance Programme if you require support. Their confidential counselling and information line is available 24/7, 365 days a year. They can provide expert guidance and counselling for a wide range of issues. This support is available to all employees and their immediate families (spouses/partners and children aged 16 – 24 who are in full-time education and live in the same household). You can call the helpline at 0800 1303414 or download the Wisdom App using code MHA147812.
- We will thoroughly investigate every formal complaint objectively and confidentially while ensuring that we respect your rights and the rights of the alleged bully/harasser.
- We will undertake regular risk assessments to determine effective ways to minimise the risk of exposure to sexual harassment in the workplace and by third parties you may have contact with.

## What We Expect from You

- We expect all our people to be responsible for observing, upholding, promoting, and applying this policy.
- At Amey, we always prioritise the health and safety of our people. This includes ensuring that people are not subjected to bullying or harassment in the workplace. The Zero Code reminds us to Shout Out if we see unsafe or unacceptable conditions. If you witness or experience bullying or harassment, we encourage you to do so without delay.
- Any dealings with third parties, including customers, suppliers, contractors, agency staff and consultants, must be free from discrimination, harassment, victimisation, or bullying
- If any of our people are found to have committed, authorised, or condoned an act of bullying or harassment or have made untrue malicious complaints, we will take action against them. For those to whom it applies, this includes following our disciplinary policy and process, which could result in disciplinary action, including dismissal without notice.
- There is no justifiable reason to bully or harass someone else. For example, observing a particular religion is not a legitimate reason for bullying or harassing a colleague because of their sexual orientation. Even if you do not intend to bully or harass someone else, this does not legitimise such behaviour.
- You should be aware that you can be personally liable for harassment.

## Training

All new employees must attend the Learn Upon training session on the Amey Code, Bullying and Harassment, Equality, Diversity and Inclusion, and Unconscious Bias as part of their induction. Current employees must attend equality, diversity, and inclusion training as and when required.

## Our Affinity Groups

We are proud to support the work of our Affinity Networks, which help us continually improve our culture. We strongly encourage all our people to proactively support our equality, diversity, and inclusion initiatives by attending events and workshops organised by our affinity groups to educate themselves on the challenges others face and how to help alleviate these in the workplace.

### Support for those affected or involved

We understand that anyone affected by or involved with a complaint of bullying or harassment may feel anxious or upset, and we will do what we can to support you. If you feel that you cannot continue to work in close contact with the alleged bully/harasser, we will carefully consider any requested changes to your working arrangements while we investigate the matter.

For emotional support, you can access free, confidential counselling from our Employee Assistance Programme. This independent and confidential service provides a range of valuable resources and advice that you may find helpful. You can access the service by calling 0800 130 3414 or downloading the Wisdom App, which you can access using code MHA147812.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If you feel you have suffered such victimisation, please inform your people manager or people partner as soon as possible.

Regardless of the outcome of your complaint, we will carefully consider how to best approach any ongoing working relationship between you and the individual concerned, including any third party. For example, depending on the specific circumstances, we may consider amending either your or the other person's job duties, location, or reporting lines. Alternatively, we may decide workplace mediation or counselling is appropriate.

### Confidentiality

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties. Failure to do so could result in disciplinary action, including dismissal (or other appropriate action for non-employees).

## What to do if you are being bullied or harassed

### Informal Route

You may decide to raise the issue with the individual directly, making it clear that their behaviour is inappropriate and asking them to stop. They may not be aware that their behaviour is offending you. Alternatively, you may consider asking your people manager or HR for support. You may or may not want them to talk to the individual on your behalf, and where possible, we will respect your wishes. However, if your welfare or safety is at risk or your allegations are particularly serious, we may have to approach the individual and instigate a formal investigation, but we will do all we can to maintain your anonymity where possible.

Bullying or harassment by third parties, such as clients, suppliers, or contractors, will not be tolerated. If you witness or are experiencing bullying or harassment by a third party, such as a client or a supplier, we encourage you to report this to your people manager without delay so that they can advise and support you on the best course of action.

### Formal Route

If you are unhappy with the outcome of an informal process or feel it is inappropriate to approach the issue informally, you may decide to raise it formally.

To file a formal complaint, you should first discuss this with your line manager. If your complaint is about your line manager, you should raise this with their people manager.

Amey employees can raise a formal complaint of bullying or harassment under our grievance policy and process; however, you may prefer to raise the matter under this Dignity at Work policy as it specifically deals with such issues. You should be aware that you cannot file a complaint under this policy if you have already filed a complaint about the same issue under the grievance policy and process.

Under the formal route within this policy, we will:

- Ask you to write your complaint and include as much detail as possible, such as the alleged bully/harasser's name, the nature of the bullying/harassment, the dates of the alleged acts, the names of any witnesses, and details of any action taken to address the matter so far.
- Appoint an appropriate manager will then be appointed to carry out an investigation. They may wish to meet with you to discuss your concerns more thoroughly. You may be accompanied to the meeting by a work colleague or a Trade Union representative if you wish. They will also meet with the alleged bully/harasser to ascertain their response to the allegations and conduct further investigations where necessary. This may include interviewing potential witnesses, to whom we are instructed to keep the matter confidential.
- Following the investigation, make a decision regarding whether or not the matter should be dealt with under our disciplinary policy and process. You will be informed of the outcome and, if you wish, be given the opportunity to ask any further questions. Please note that due to reasons of confidentiality, we will not be able to discuss the outcome of any disciplinary proceedings relating to another individual.

We will use every effort to complete an investigation into bullying or harassment as quickly as possible.

Where the alleged bully/harasser is a third party, we may need to adjust the procedure under this policy to ensure we conduct appropriate investigations, and we will discuss this with you.

People managers must contact Croner for advice and guidance as soon as they are made aware of an informal or formal complaint of bullying or harassment.

## Appeals

If you are not satisfied with the outcome of the formal investigation, you have the right to appeal.

Should you wish to appeal, you should submit your appeal in writing, stating what aspects of the decision you are unhappy with and the reasons why. Appeals should be submitted without unreasonable delay and usually no longer than seven days after we inform you of the decision.

If you do appeal, an independent manager will be appointed to handle it. They will arrange a meeting with you to discuss your appeal in full and try to reach a satisfactory solution. You must take all reasonable steps to attend this meeting, and a colleague or trade union representative may accompany you.

The appeal manager will write to you to confirm the outcome of the appeal, which will be final.

Whilst we will take any complaints of bullying or harassment seriously, we reserve the right to amend or vary any part of this process for agency workers, contractors and people engaged by our suppliers.

## Anonymous Reporting

We understand that it can be daunting to call out inappropriate behaviours of others, especially when it involves recounting a potentially traumatic experience. There may be times when people would prefer to remain anonymous. You can raise anonymous concerns via our whistleblowing helpline on 0800 1601797. Please be assured that the helpline is run by an independent organisation that passes the information to us for investigation. For further details, please see our whistleblowing policy.

## Consequences of breaching this policy

If, following a formal investigation, we find that you have committed, authorised, or condoned an act of bullying or harassment, we will deal with the issue in accordance with our disciplinary policy and process.

We may take disciplinary action against you, including dismissal (or other appropriate action for non-employees). You should be aware that any aggravating factors, such as abuse of position or power, will be considered when deciding what disciplinary action to take.

Anyone who, in good faith, complains or takes part in an investigation into bullying or harassment must not suffer any form of detrimental treatment or victimisation. If we find that you have victimised anyone in this way, we will instigate disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

## Examples of Inappropriate Behaviour

<p><b>Harassment</b></p>	<p>Harassment can occur in many forms and can take place either at work, outside the workplace or online. While this is not an exhaustive list, examples include:</p> <ul style="list-style-type: none"> <li>• Spoken or written word, banter, jokes, graffiti, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory about a protected characteristic.</li> <li>• Unwanted physical behaviour, for example, pushing or grabbing.</li> <li>• Excluding someone from a conversation or a social event or marginalising them from the group.</li> <li>• Derogatory comments about pregnancy, maternity leave or IVF treatment.</li> <li>• Mimicking or making fun of someone's disability.</li> <li>• Derogatory or offensive comments about religion. For example, this could include comments which are considered to be Islamophobic or anti sematic.</li> <li>• Unwelcome comments about someone's appearance or how they dress were related to a protected characteristic.</li> <li>• "Outing" (i.e. revealing their sexual orientation against their wishes) or threatening to "out" someone.</li> <li>• Consistently using the wrong names and pronouns following the transition of a person's gender identity.</li> <li>• Displaying images that are racially offensive or sexist.</li> <li>• Excluding or making derogatory comments about someone because of a perceived protected characteristic or because they are associated with someone with a protected characteristic.</li> </ul>
<p><b>Sexual Harassment</b></p>	<p>Sexual harassment can occur in many forms. While this is not an exhaustive list, examples include:</p> <ul style="list-style-type: none"> <li>• Physical conduct of a sexual nature, unwelcome physical contact or intimidation, which may include touching, hugging, massaging or kissing;</li> <li>• Persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;</li> </ul>

	<ul style="list-style-type: none"> <li>• Showing or sending offensive or pornographic material by any means (e.g. by text, video clip, WhatsApp message, email or by posting on the internet or social media);</li> <li>• Unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;</li> <li>• Offensive comments about appearance or dress, innuendo, or lewd comments;</li> <li>• Leering, whistling or making sexually suggestive gestures; and</li> <li>• Gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours</li> <li>• Inappropriate behaviour of a sexual nature whilst as a company organised event, or social gathering.</li> </ul>
<p><b>Bullying</b></p>	<p>While this is not an exhaustive list, bullying may include:</p> <ul style="list-style-type: none"> <li>• Shouting at staff.</li> <li>• Blocking promotion.</li> <li>• Physical, verbal or psychological threats;</li> <li>• Excessive levels of supervision (micromanagement)</li> <li>• Inappropriate and derogatory remarks about a person's performance.</li> <li>• Setting someone up to fail through unrealistic targets or deadlines or belittling them in front of colleagues.</li> <li>• Regularly making someone the butt of jokes</li> </ul>



**Andy Milner**

Chief Executive

March 2025

## Useful Links & Resources

### Amey Policies

- [amey\\_code-final.pdf](#)
- [Inclusion Policy](#)
- [Gender identity Policy](#)
- [Menopause Policy](#)
- [Statement on zero tolerance to Sexual Harassment](#)
- [Disciplinary Policy](#)
- [Whistleblowing Policy and Procedure](#)

### Useful Links

- [Mental health helplines - Mind](#)
- [Where to get urgent help for mental health - NHS \(www.nhs.uk\)](#)
- [National Suicide Prevention Helpline Uk » Home \(spuk.org.uk\)](#)
- [Samaritans | Every life lost to suicide is a tragedy | Here to listen](#)
- [Sexual harassment - Victim Support](#)

## Revision status

REVISION	DATE	AMENDMENT	CONTENT OWNER	MANDATED BY
1	October 2024	New Policy	Nicola Hill	Chief People Officer
2				
3				