

LEE VALLEY REGIONAL PARK AUTHORITY
AUTHORITY MEETING
23 OCTOBER 2025 AT 14:00

Agenda Item No:

9

Report No:

A/4369/25

ANTI-HARASSMENT, BULLYING AND VICTIMISATION POLICY

Presented by the Head of Human Resources

SUMMARY

The purpose of this report is to seek Member approval for an Anti-Harassment, Bullying & Victimisation Policy. This policy has been developed to take account of legislative changes, best practice and the Authority's business objectives.

This policy was considered by the Executive Committee on 25 September 2025 (Paper E/898/25) and was approved for recommendation to Authority.

RECOMMENDATION

Members Approve: (1) the Anti-Harassment, Bullying & Victimisation Policy as set out in Appendix A to Paper E/898/25 attached at Annex A to this report.

BACKGROUND

- 1 The Authority has a register of policies that ensure the organisation works efficiently and consistently towards delivering its Business Strategy. These policies are regularly reviewed to ensure they are relevant and up to date with legislation and best practice.
- 2 It should be noted that where possible the Authority implements legislative changes from the date they are introduced and there may be a time lag between this and the relevant policies being updated.
- 3 The Executive Committee approved for recommendation to Authority an Anti-Harassment, Bullying & Victimisation Policy at its meeting on 25 September 2025 (Paper E/898/25) which is attached at Annex A to this report for Members' consideration and approval.
- 4 Any environmental, financial, human resource, legal and risk management implications are covered within Paper E/898/25 attached as Annex A to this report.

Author: Victoria Yates, 07739 852 235, vyates@leevalleypark.org.uk

PREVIOUS COMMITTEE REPORT

Executive Committee	E/898/25	Anti-Harassment, Bullying & Victimisation Policy	25 September 2025
------------------------	----------	---	-------------------

ANNEX ATTACHED

Annex A	Paper E/898/25
---------	----------------



LEE VALLEY REGIONAL PARK AUTHORITY

EXECUTIVE COMMITTEE

25 SEPTEMBER 2025 AT 10:30

Agenda Item No:

Report No:

E/898/25

ANTI-HARASSMENT, BULLYING & VICTIMISATION POLICY

Presented by the Head of Human Resources

EXECUTIVE SUMMARY

The purpose of this report is to seek Members recommendation for approval of the Anti-Harassment, Bullying & Victimisation policy. This policy has been developed to take account of legislative changes, best practice and the Authority's business objectives.

RECOMMENDATION

Members Recommend to (1) the Anti-Harassment, Bullying & Victimisation Authority: Policy attached at Appendix A of this report.

BACKGROUND

- 1 The Authority has a register of policies that ensure the organisation works efficiently and consistently towards delivering its Business Strategy. These policies are reviewed to ensure they are relevant and up to date with legislation and best practice.
- 2 It should be noted that the Authority implements legislative changes from the date they are introduced; and there may be a time lag between this and the relevant policies being updated.

ANTI-HARASSMENT, BULLYING & VICTIMISATION POLICY

- 3 A draft of the Anti-Harassment, Bullying & Victimisation Policy is attached at Appendix A of this report for Members' consideration and recommendation to Authority.
- 4 The Worker Protection (Amendment of Equality Act 2010) Act 2023, which came into force on 26 October 2024, creates a duty on employers to take reasonable steps to prevent sexual harassment in the workplace.
- 5 The Authority adopts a zero-tolerance approach to harassment and bullying of any kind. This policy supports this aim by setting out the steps the organisation will take to prevent, investigate and deal with complaints of harassment or bullying, and how those affected will be supported.

- 6 This policy aims to provide a work environment where all staff feel supported and equipped to challenge and report any concerns in the confidence that they will be taken seriously and will not be victimised as a result.

ENVIRONMENTAL IMPLICATIONS

- 7 There are no environmental implications arising directly from the recommendations in this report.

FINANCIAL IMPLICATIONS

- 8 There are no financial implications arising directly from the recommendations in this report.

HUMAN RESOURCE IMPLICATIONS

- 9 This policy will be communicated to all staff and the Authority will ensure that managers are adequately trained to implement the procedures in accordance with this policy.

LEGAL IMPLICATIONS

- 10 The legal implications are set out in the body of this report.

RISK MANAGEMENT IMPLICATIONS

- 11 There are no risk management implications arising directly from the recommendations in this report.

Author: Victoria Yates, 07739 852 235, vyates@leevalleypark.org.uk

APPENDIX ATTACHED

Appendix A Anti-Harassment, Bullying & Victimisation Policy

Anti-Harassment, Bullying & Victimisation Policy

August 2025

Reference: [Version 1.0]

ii Document information

Title:	Anti-Harassment, Bullying and Victimisation Policy
Status:	Draft
Current Version:	1.0

Author:	Victoria Yates – Head of Human Resources Human Resources ✉ vyates@leevalleypark.org.uk ☎ 07739 852 235
Sponsor:	Beryl Foster – Deputy Chief Executive Corporate Services ✉ bfoster@leevalleypark.org.uk ☎ 01992 709 836
Consultation:	Human Resources, Policy & Procedure Review Group, Senior Management Team
Approved:	Approved by: Authority Approval Date: October 2025 Review Frequency: Every 5 years or earlier if there is a change in Government legislation Next Review: October 2030

[illegible]

ii Contents

Preliminary Pages		
Section	Title	Page
Cover	Title Page	1
i	Document Information	2
ii	Contents	3

Contents		
Section	Title	Page
1	Background	4
2	Scope	4
3	Policy Aims	4
4	Definitions	5
5	Informal Resolution	7
6	Formal Resolution	8
7	Complaints Relating to Third Parties	8
8	Support	9
9	Responsibilities	9
10	Legal Considerations	10
11	Relevant Policy and procedures	10
12	Monitoring & Evaluation	10

1. Background

- 1.1 The Worker Protection (Amendment of Equality Act 2010) Act 2023 creates a duty on employers to take reasonable steps to prevent sexual harassment in the workplace.
- 1.2 The Authority is committed to creating work environments, the delivery of services and relationships between all stakeholders that is free from harassment, bullying and victimisation, where everyone is treated with dignity and respect.
- 1.3 The Authority adopts a zero-tolerance approach to harassment and bullying of any kind. This policy supports this aim by setting out the steps the organisation will take to prevent, investigate and deal with complaints of harassment or bullying, and how those affected will be supported. The Authority will not tolerate victimisation of a person for making allegations of harassment or bullying in good faith or supporting someone to make such a complaint.
- 1.4 The Authority is committed to taking proactive measures to prevent all forms of bullying and harassment, including sexual harassment.
- 1.5 This policy accompanies the Authority's Equality, Diversity and Inclusion Policy.

2. Scope

- 2.1 This policy applies to everyone working for the Authority. This includes employees, workers, contractors, volunteers, apprentices, placements and third parties. All of those the policy applies to will be referred to as "staff" in this policy.
- 2.2 The policy relates to all stages of the employment relationship. It extends to social activities related to the workplace.
- 2.3 It also applies to interactions with third parties, including customers, members of the public, suppliers and other organisations, which must be free from harassment, bullying and victimisation.

3. Policy Aims

Aims of the Policy:

- 3.1 To ensure the Authority meets its legal obligations by providing staff with protection from bullying, sexual harassment, harassment, and victimisation. Moreover, the intention of this policy is to prevent and reduce all forms of offensive, unacceptable, and unfair behaviour, whether or not such behaviour is unlawful.
- 3.2 To provide a work environment where all staff feel supported and equipped to challenge and report any concerns in the confidence, that they will be taken seriously and will not be victimised as a result.
- 3.3 To provide information on how to raise a concern and the range of support mechanisms available.
- 3.4 To ensure that all staff are aware of the types of behaviour which can constitute bullying or harassment and their responsibilities for preventing such behaviour.

- 3.5 To ensure that all staff understand that bullying or harassment is intolerable and unacceptable, and that formal action may be taken against offenders.
- 3.5.1 Provide arrangements whereby complaints can be investigated in a manner, which recognises the sensitivity of the issues raised, and the rights of all parties.
- 3.5.2 Ensure that all allegations of bullying or harassment are responded to promptly and with the complainant's confidentiality protected as far as possible.

4. Definitions

4.1 Harassment

For the purpose of this policy harassment is defined as unwanted conduct 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. A single incident can be harassment if it is sufficiently serious.

Harassment can be on a wide variety of grounds including:

- any of the protected characteristics;
- Trade union membership, or lack of membership;
- being a part-time worker or fixed-term contract worker;
- real or suspected infection with AIDS/HIV;
- willingness to challenge harassment, leading to victimisation;
- health and physical characteristics;
- the belief that someone has a protected characteristic; and
- association with someone with a protected characteristic.

Examples of harassment can include, but are not limited to:

- unsuitable comments;
- physical attacks;
- isolating or denying an individual's presence; and
- sending inappropriate emails or letters to an individual.

4.2 Sexual Harassment

Sexual harassment is defined 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; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Sexual harassment is unlawful and organisations are required to take reasonable steps to prevent sexual harassment of their workers in the course of their employment and by third parties.

Examples of sexual harassment

Sexual harassment can occur in many forms and can take place either at work, outside work, in person or online. While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;
- persistent suggestions to meet up socially after a person has made it clear that they do not welcome such suggestions;

- showing or sending offensive or pornographic material by any means;
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

4.3 Bullying

Workplace bullying can be defined as offensive, intimidating, malicious, insulting or humiliating behaviour, abuse of a position of power that attempts to undermine an individual or a group of staff. It can occur at any level and within any relationship and is not confined to management or supervision. Individuals may be bullied by colleagues as well as by managers or supervisors and groups of individuals may bully individuals.

It is important to understand that legitimate, reasonable and constructive feedback on an individual's performance or behaviour, or reasonable instructions given to individuals in the course of their employment will not constitute bullying.

Examples of bullying

While this is not an exhaustive list, bullying may include:

- persistent unfair criticism;
- setting objectives with unreasonable targets/timelines;
- ignoring or excluding an individual;
- withholding information that should properly be shared;
- removing areas of responsibility unreasonably, and/or allocating menial tasks;
- undervaluing effort, taking credit for another's ideas, spreading malicious rumours;
- unreasonably denying leave/training applications;
- intimidation; and
- aggressive behaviours.

4.4 Discrimination

The Equality Act 2010 defines:

- direct discrimination as less favourable treatment due to a protected characteristic;
- indirect discrimination against individuals because they have a relevant protected characteristic is also covered, with the exception of pregnancy and maternity; and
- associative discrimination applies when someone is treated unfairly because either someone they know or someone they are associated with has a certain characteristic.

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Gender
- Sexual orientation

4.5 Victimisation

This means treating someone less favourably than others because they, in good faith, complained (whether formally or informally) that someone has been bullying or harassing them or someone else, or they have supported someone to make a complaint or given evidence in relation to a complaint.

Examples of victimisation could include:

- isolating someone because they have made a complaint;
- giving someone more difficult or onerous tasks; and
- treating someone unfairly for supporting a colleagues complaint.

4.6 Microaggressions

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

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

Examples of Microaggressions include:

- conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example directing limp-wristed hand gestures towards a gay colleague and saying, "It's just a joke";
- unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability, "You don't look disabled to me"; and
- 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".

5. Informal Resolution

- 5.1 It may be possible to rectify matters informally in some cases where staff feel they may have been or are being bullied or harassed. People are often unaware that their behaviour is unwelcome. At an early-stage colleagues are encouraged to tell the person responsible that their behaviour is unwelcome, if they feel comfortable doing so, that it is causing them distress and to ask them to stop. Alternatively, they may find it easier to write to them. They may find that keeping a written record may help.
- 5.2 If the harassment or bullying continues or the staff member feels unable to speak or write to the person directly, informal resolution of matters can sometimes be best achieved through timely dialogue with their manager. If their manager is the alleged harasser or if they do not wish to raise the issue with their manager, then they should speak to a more senior manager or a member of the HR Team.
- 5.3 At this stage the manager will try to resolve the situation informally using several different options. These could include the manager:
 - speaking to the alleged harasser directly about the concern;
 - arranging a meeting where both parties come together with the manager, another manager or HR representative for a facilitated conversation, where appropriate; and

- arranging mediation.

6. Formal Resolution

- 6.1 A formal request for resolution should be made via the Authority's Grievance and Problem Solving Policy where either:
- the informal procedure is exhausted;
 - the matter is considered too serious; and
 - the staff member does not wish to deal with the matter informally.
- 6.2 A manager may suggest supporting informal resolution where a colleague raises a formal concern without having initially tried to resolve the situation informally.
- 6.3 The individual(s) about whom the issues are raised and their manager or volunteer supervisor, if different, must be informed of the nature of the complaint lodged against them.
- 6.4 Appropriate support should be provided to both parties.
- 6.5 In some cases, there is a risk to the complainant or their colleagues, or to the integrity of the investigation. In such cases consideration will be given to urgent and temporary actions:
- adjustment to duties;
 - adjustment to work pattern;
 - adjustment to work location; and
 - suspension from duty.
- 6.6 This will be pending a fuller review or investigation and will be based on individual circumstances, as opposed to organisational pressures.
- 6.7 Formal investigations will be carried out in accordance with the Authority's Grievance and Problem Solving Policy and Procedure and with minimum delay.

7. Complaints Relating to Third Parties

- 7.1 The Authority has a zero-tolerance approach to harassment, bullying and victimisation by third parties, such as customers, members of the public, suppliers or contractors.
- 7.2 If an individual is experiencing harassment, bullying or victimisation by a third party, they should report this to their line manager/senior manager or HR as soon as possible. Advice and support will be provided on the next steps and best course of action appropriate to the circumstance. Where applicable, this may include contacting the third party.

8. Support

- 8.1 Support will be provided to manage the effects of harassment, bullying or victimisation, including counselling and mediation, as appropriate.
- 8.2 During or following any complaint, either party may be concerned about working with the other again. If an individual feels they cannot continue to work in close contact with the other party, consideration will be given to alternative working arrangements whilst the investigation process takes place.

- 8.3 It is recognised that it takes courage to make a complaint and support will be offered to ensure that everyone is protected from victimisation for assisting in or bringing a complaint, when this has been made in good faith. Any concerns relating to victimisation should be discussed with the line manager or HR as soon as possible. However, it is also important to note that making a malicious complaint that the individual knows to be untrue may lead to disciplinary action being taken.
- 8.4 It is recognised that all parties should be given support throughout the complaint process. All parties will be kept appropriately updated throughout this process.

For free, confidential counselling please contact the Employee Assistance Programme (EAP), HR can provide further information. There are also a number of external support groups available online.

9. Responsibilities

- 9.1 The Senior Management Team is accountable for ensuring that this policy is implemented across the Authority, ensuring it is communicated and understood, translated into practice and enforcing its contents.
- 9.2 The Human Resources Team is responsible for ensuring all staff receive regular and adequate training on equality, diversity and inclusion including harassment, bullying and victimisation.

9.3 Manager responsibilities

Implementation of this policy is the responsibility of managers. Managers are expected to:

- create a workplace free from harassment, bullying and victimisation with a supportive and open culture;
- actively engage in all relevant training;
- be role models of acceptable behaviour;
- be proactive and take action as soon as unacceptable behaviour comes to their attention, and to deal with it swiftly and sensitively;
- not abuse their position of power or send mixed messages about unacceptable behaviour; and
- seek advice from Human Resources at any stage.

Managers are also responsible for ensuring that team members perform to their best ability and to an acceptable standard. It is important that legitimate concerns or constructive feedback about an individual's behaviour or performance are managed in an appropriate manner to prevent complaints of harassment, bullying or victimisation.

9.2 Staff responsibilities

- Treating colleagues with dignity and respect and being tolerant of and sensitive to the views of others who may have different beliefs, experiences and/or values.
- Actively engage in all relevant training.
- Ensure their own behaviour cannot be construed as harassment, bullying or victimisation.
- Maintaining a working environment and conducting their work in such a manner to be free from harassment, bullying and victimisation for the benefit of everyone.

- Being supportive to others who may be experiencing harassment, bullying or victimisation and encouraging them to report this or reporting this yourself even if that is anonymously.
- Making it clear to others when their behaviour is unacceptable.
- Co-operating with any investigation into harassment, bullying or victimisation.
- Ensuring any dealings with third parties, including customers, suppliers, contractors, agency staff and consultants, is free from discrimination, harassment, bullying or victimisation.

10. Legal Considerations

- Equality Act 2010
- Worker Protection (Amendment of Equality Act 2010) Act 2023)

11. Relevant Policy & Procedures

- Performance & Conduct Policy
- Disciplinary Procedure
- Grievance & Problem Solving Policy
- Grievance & Problem Solving Procedure
- Appeals Procedure
- Equality, Diversity & Inclusion Policy
- Whistleblowing Policy

12. Monitoring & Evaluation

- 12.1 HR will keep a record of harassment, bullying and victimisation complaints to monitor any patterns of behaviour and to inform future preventative measures.