

# Deontology Ltd Anti-Harassment and Bullying Policy & Procedure

Version 1.0, 13 Feb 2026

## Introduction

Deontology Ltd strives to offer an environment where everyone is treated with dignity and respect. We do not tolerate bullying or harassment. We have a duty of care to protect you so we make it our priority to support you if you experience problems with bullying or harassment.

If you have a problem with bullying or harassment we encourage you to use the support available to try to resolve it as early as possible, ideally in an informal way. We will investigate any complaint that you bring to our attention in a fair, independent and confidential way and, after considering all the facts, we will take prompt and appropriate action.

This Policy explains the support available and how you can informally or formally address issues with bullying or harassment. This policy offers links to external support and detailed information on bullying and harassment using examples and case studies. It also gives guidance on examples of acceptable and unacceptable behaviour.

## Who does this apply to?

This policy applies to anyone working for Deontology Ltd. This includes employees, contractors, volunteers, interns, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

We expect everyone to familiarise themselves with and adhere to the principles outlined in policy. In particular, you must behave respectfully towards others and never act in a way that could be regarded as bullying or harassment.

A non-exhaustive list of examples of acceptable and unacceptable behaviour is listed in this policy. Acts of bullying or harassment are regarded as a serious disciplinary matter and could place your continued employment or engagement with Deontology Ltd at risk. These principles extend to everyone working for or with Deontology Ltd including freelancers (contributors and presenters), sub-contractors, agency workers, those taking part in our productions, visitors and guests.

Deontology Ltd **employees** are expected to comply with the full terms of the Bullying and Harassment Policy and process.

**Freelancers** (PAYE or gross paid) who wish to make a complaint should contact their manager or [info@deontology.co.uk](mailto:info@deontology.co.uk). The same principles of fairness and objectivity will be applied. We will mirror the formal process set out in this Policy with flexibility, in exceptional circumstance, to take into account the short term nature of some freelance engagements.

**Sub-contractors and agency workers** should send any complaint to their relevant local manager. Visitors and guests should contact [info@deontology.co.uk](mailto:info@deontology.co.uk). This policy can be used if you experience bullying or harassment either at work or work-related events, for example Deontology Ltd social functions or business trips.

## **Our approach**

We will not victimise, unfairly treat or discipline you if you make a genuine informal or formal bullying or harassment complaint. We will respect and maintain your confidentiality. We will also remind anyone involved in your complaint about their responsibilities to maintain confidentiality.

As we have a duty to protect you and your colleagues, there may be times we decide to act on your complaint independently. In these situations, we will encourage you to use support services outlined in this policy, and will inform you of the outcome of our investigations if you wish to know.

You can use our informal or formal processes to resolve your complaint. However, where possible, we encourage you to try to resolve any problems informally in the first instance. There are a number of internal and external support services (found in this Policy) available to help you get the support you need.

## **What is bullying and harassment?**

Bullying or harassment can take place face-to-face, behind your back, by telephone, email, text, social media or any other form of communication. The Guide that supplements this Policy is designed to help you better understand bullying and harassment by providing examples and case studies of what is acceptable and unacceptable behaviour.

There is no statutory definition of bullying. The Advisory, Conciliation and Arbitration Service ([‘ACAS’](#)) defines bullying as offensive, malicious or insulting behaviour. It is an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure you. Bullying tactics can include hostile verbal or nonverbal communication, sabotage, exclusion, manipulation, and psychological or physical abuse. Deontology Ltd also considers intimidating behaviour to be included in the above definition of bullying.

According to the Trade Union Congress (‘TUC’) guide *‘Bullied at Work?’*, bullying behaviour can include:

- competent staff being constantly criticised, having responsibilities removed or being given trivial tasks to do
- shouting at staff
- persistently picking on people in front of others or in private

- blocking promotion
- regularly and deliberately ignoring or excluding individuals from work activities
- setting a person up to fail by overloading them with work or setting impossible deadlines
- consistently attacking a member of staff in terms of their professional or personal standing
- regularly making the same person the butt of jokes

Please note there are many actions and behaviours that do not amount to bullying. For example:

- fair and reasonable criticism of your performance or behaviour
- constructive feedback
- not being invited to meeting where you are not required
- being placed on a performance procedure where your performance is not of an appropriate standard

## **Harassment**

**Harassment** is defined by the Equality Act 2010, as unwanted conduct related to your 'protected characteristics' that has the purpose or effect of violating your dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for you. Harassment is also unwanted conduct of a sexual nature which has that same purpose or effect.

**Protected characteristics** are:

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

**Examples of bullying and harassment behaviours** include when someone:

- puts you down or deliberately embarrasses you
- makes insulting or offensive comments or jokes
- scares you, makes threats or shouts at you
- uses insulting words or threatening body language
- ignores you or unreasonably keeps you out of meetings or events
- stops or blocks you from doing your job
- threatens you or commits physical violence
- leaves offensive items around your work area

**Examples of sexual harassment** include when someone:

- makes unwelcome sexual advances or touches you in an intrusive way
- makes sexual jokes
- displays pornographic photographs or drawings around your work area

- sends you emails with material of a sexual nature

### **What to do if you are being Bullied or Harassed (Informal route)**

#### ***Bully/harasser is a colleague***

If you feel able to, and where you believe there is a reasonable prospect of resolution, you may decide to raise the issue with the individual themselves, to make clear that their behaviour is not welcome and to ask them to stop. They may not be aware that their behaviour is offending you or it may be unintentional on their part.

Alternatively, if you do not feel up to speaking directly to the individual, you may consider asking your line manager, or an alternative manager for support. If the individual causing offence is your line manager or a someone senior in the work structure, you may wish to speak with Human Resources for further guidance.

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 the welfare or safety of you or others is at risk or where your allegations are particularly serious, we may have to approach the individual and instigate a formal investigation. In such a case we will, where possible, discuss this with you first.

Mediation is a voluntary and confidential process and if you do not wish to take part in mediation, you do not have to. The mediator will be impartial, neutral and fully trained to conduct mediation whether they be an internal or an external resource. Mediation can help to mend workplace relationships by:

- Finding solutions that everyone agrees to
- Improving communication.
- Allowing everyone involved to have control of what is finally agreed.

Mediation can be used at any stage in a disagreement but the earlier the disagreement is dealt with, the less chance there is of things becoming more difficult and entrenched.

#### ***Bully/harasser is a third party***

If you are experiencing bullying or harassment by a third party, for example a client or a supplier, we encourage you to report this to your line manager without delay so that they can consider what action it may be possible to take or how you should respond taking account of the fact this is a third party.

### **What to do if you are being Bullied or Harassed (Formal route)**

If you are not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise your complaint formally.

To make a formal complaint, you should discuss this first with your line manager. If your complaint is about your line manager, you should raise this with another appropriate manager. If you have any queries you should refer to [info@deontology.co.uk](mailto:info@deontology.co.uk). Under the formal procedure within this policy:

- We will usually ask you to set out your complaint in writing or via email. Please include as much detail as possible, for example:
  - the alleged bully/harasser's name
  - the nature of the bullying/harassment
  - the dates of the alleged acts of bullying/harassment
  - names of any witnesses
  - and details of any action taken to address the matter so far;
  - any other information that you feel is directly relevant
- you may be asked to discuss this in more detail with the investigating officer
- you can expect the matter to be investigated, which may include meeting with the alleged bully/harasser to ascertain their response to the allegations. It may also include interviewing potential witnesses who we will instruct to keep the matter confidential
- expect the manager chairing the matter to carry out further investigations of the complaint where necessary
- invite you to a meeting to discuss your complaint in full. You will have the right to be accompanied by a colleague or trade union representative
- hold a meeting with you to enable us to ask you further questions in light of any information we have gathered from the alleged bully/harasser and/or witnesses
- the chair will consider all the evidence in full and make a decision and inform you of the decision (this will normally be in person without unreasonable delay) and, if we uphold the complaint, instigate disciplinary action up to and including dismissal against the bully/harasser. You will be notified of the timescales involved and any decision will be confirmed to you in writing.

We will investigate fully every formal complaint in an objective and confidential way, ensuring that we respect your rights as well as the rights of the alleged bully/harasser. You are of course welcome to be accompanied by a work colleague or Trade Union Representative to any investigatory meetings held. 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.

### **Right to Representation**

At any formal meeting you have the right to be represented by a work colleague or a Trade Union representative. However, consideration will be given to another person in exceptional circumstances.

### **Appeals**

If you are not satisfied with the outcome of the formal hearing, you have the right to appeal. Should you wish to appeal, you should write to the Manager referenced in the outcome letter setting out 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 five working days after we inform you of the decision. The manager or delegated person will arrange a meeting with you to discuss your appeal in full and to try and reach a satisfactory solution. You must take all reasonable steps to attend this meeting and you may be accompanied by a colleague or trade union representative. If you cannot attend for a genuine reason the matter will normally be rescheduled at least one time (thereafter it may be held in your absence). The manager or delegated person will write to you to confirm the outcome of the appeal, which will be final.

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 you cannot continue to work in close contact with the alleged bully/harasser, we will seriously consider any requested changes to your working arrangements during our investigation into the matter. 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. We take such matters very seriously, if you feel you have suffered any victimisation, please inform your line manager as soon as possible. Equally, making malicious, vexatious or false allegations will not be tolerated and is a disciplinary offence. Regardless of the outcome of your complaint, we will consider carefully how to best approach any ongoing working relationship between you and the individual concerned. For example, depending on the specific circumstances, it may be possible to consider amending the job duties, location or reporting lines of either you or the other person. For example, where the roles in question mean that this is possible to manage without disrupting the work. Alternatively, we may propose that workplace mediation or counselling is appropriate if this can be agreed voluntarily by the parties.

### **Sensitivity and 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. If you are found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

### **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 as a possible case of misconduct or gross misconduct.

We may take disciplinary action against you, up to and including dismissal (or other appropriate action for non-employees).

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 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). We will also offer support for all those affected as we seek to encourage a positive work environment free of harassment and bullying where employees are confident to speak out and use this policy should it ever be required.