



## **Bullying & Harassment Policy**

### **1. Introduction**

We do not tolerate any harassment or bullying of our employees by other members of staff. In particular, racial or sexual harassment is unlawful and has no place in any workplace which we operate. There may, however, be other forms of harassment, such as bullying, which are equally unacceptable.

Accordingly, we have published this policy statement which we hope makes clear our commitment to ensuring that all our employees enjoy a working environment free from harassment. If you suffer any form of harassment, you should not hesitate to use the procedure set out below – please do so, because it is in the interests of all of us.

All employees have a responsibility to comply with this policy and to treat colleagues of both sexes with dignity and respect. Conduct which may amount to sexual harassment is often not intended to cause offence but occurs because of a lack of awareness of other people's feelings.

Allegations of harassment will be dealt with seriously and confidentially. You will not be victimised if you bring a complaint. However, you should always remember that you should not bring a complaint frivolously and should not do so as a way to retaliate against a fellow employee.

### **2. What is Sexual Harassment?**

Sexual harassment is unwanted conduct of a sexual nature, or other conduct based on sex, which affects the dignity of men and women at work.

Examples of conduct which may constitute sexual harassment and are clearly unacceptable are:

- Giving someone unwanted sexual attention.
- Insulting or ridiculing someone because of their sex.
- Suggesting that sexual favours may further employee's career or that refusal may hinder it.
- Lewd, suggestive or over familiar behaviour.
- The display or circulation of sexually suggestive material.

This is not intended to be an exhaustive list of examples.

A single incident can constitute sexual harassment, if it is sufficiently serious. Equally, however, minor but persistent, unwanted sexual attention can also constitute sexual harassment. Clearly, there can be cases falling between the two.

### **3. Procedure**

If you have been subject to what you think may be harassment and you do not want it to happen again, the matter may be capable of being dealt with if you simply tell the other employee that you do not want a recurrence.



However, this may not work, or you may not wish to confront the individual concerned, in which case you should use the procedure set out below.

If you are in any doubt about whether an incident or series of incidents which have occurred to you constitute harassment, then in the first instance you should approach the Company Secretary or a Director confidentially on an informal basis. They will be able to advise you, based on what they think.

If your complaint merits further action, the matter will be dealt with formally. If possible, the complaint should be resolved on an informal basis by explaining to the relevant person that the conduct to which you have been subjected is unacceptable.

If that does not produce the required result, or if formal investigation of a complaint is appropriate, you will be interviewed by the Company Secretary or Director to establish the full details of what happened. Either at the initial interview or during the course of an investigation, issues which may be raised with you may include:

- What happened, when and where?
- Who in your workplace knows about the incident or incidents?
- Did the incident affect your work?
- Do you know of anyone else in your workplace who has suffered from the same kind of behaviour?
- Have you notified anybody else in management of the situation and, if so, what did that person do about it?
- What do you want to be done?

You will be asked not to discuss the investigation of the alleged incidents with anyone else in your workplace, but a prompt timetable will be set down for investigation.

The investigation may involve interviews with the person against whom you are making the complaint and you will be informed of whether or not we believe that your complaint is well founded. Disciplinary action may then be taken against the person alleged to have committed the behaviour you are complaining about and, depending upon the circumstances of the individual and the seriousness of the complaint, that may result in his or her dismissal.

The investigation will be thorough and impartial and will not be carried out by anybody in direct contact with the parties concerned. A friend, employee representative or some other appropriate person may be present when either you or the person who is alleged to have done the acts complained of puts their side of the case.

We hope that, by issuing this policy statement, we have made clear our commitment to a workplace free of harassment.

You should remember that this policy has two aspects. It entitles you to work free from harassment and it also obliges you to ensure that you do not submit others in the workplace to harassment.



You should be aware of your own responsibilities under this policy, which is real and will be firmly applied.

A handwritten signature in dark blue ink, appearing to read "Ciaran O'Duffy", is written over a light blue rectangular background.

Ciaran O'Duffy  
Managing Director  
28.06.24