

ANTI-BULLYING AND HARRASSMENT POLICY

Our commitment

The Academy is committed to creating an inclusive and welcoming work environment which is free from harassment and bullying and where everyone can achieve their potential. The Academy will not tolerate any form of bullying or harassment under any circumstances. All employees and including any other individuals engaging in Academy activity should feel empowered to share their concerns if their experience falls below this standard.

Policy Purpose and Principle

The Royal Academy of Engineering aims to ensure that all employees and other individuals engaging in Academy activity work in an environment that respects their personal rights and dignity and which is free from unacceptable behaviour and conduct. The Academy holds a duty of care to protect all employees and individuals within the workplace and during other work-related settings including business trips and social events.

The Academy makes it a *priority to support* any individual if they are experiencing bullying or harassment from anyone connected with Academy activities. The Academy wants everyone to feel confident that their complaint against any other individual will be taken seriously and action will be taken as quickly as possible. The Academy encourages any individual experiencing bullying or harassment to report their experience so that the support available can be used to resolve the situation as early as possible.

Bullying or harassment by staff or Fellows is considered to be a disciplinary offence. Incidents will be investigated, as per this policy, and if proven, action will be taken in accordance with the Academy's Disciplinary Policy and Procedure for staff ([Disciplinary Policy](#), [Disciplinary Procedure](#)) or the Disciplinary Procedures and Fellows' Code of Conduct ([Fellows' Code of Conduct](#)).

The policy will be regularly monitored by the Human Resources team to ensure that it is achieving its aims and that managers and staff are confident about its application.

Who does the policy apply to?

The Academy has a duty of care to protect all individuals who are engaged in activities in the name of the Academy. The policy applies to all employees at the Academy, and extends to workers, secondees, interns, Fellows, grant holders, awardees, applicants and other people who are acting on behalf of the Academy or participating in Academy activities or events. It also includes job applicants, contractors or other third parties working in, or on behalf of, the Academy. Fellows will adhere to the [Fellows' Code of Conduct](#) which expects the same standards.

The policy extends to all Academy activities (whether in person or virtual), whether during working hours or outside of normal working hours, on or off the premises, UK or international, or delivered directly by the Academy or via third party suppliers. The policy does not apply to third party events and their guests held at Prince Philip

House. However, the policy will apply if staff are bullied or harassed by a guest of the third party.

What are bullying and harassment?

Bullying and harassment can occur in many different forms. For example, face-to-face, behind someone's back, by telephone, texts, social media, or any other form of communication. More detail is provided on each below:

Bullying

There is no statutory definition of bullying. However, ACAS, the Advisory, Conciliation and Arbitration Service, defines it as an offensive, malicious or insulting behaviour. Bullying is behavior from a person or group that is **unwanted and makes the victim feel uncomfortable**.

It is an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure an individual. Bullying tactics can include hostile verbal or nonverbal communication, sabotage, exclusion, manipulation, and psychological or physical abuse. Intimidating behaviour can also be considered as bullying.

Examples of bullying include:

- competent staff being constantly criticised, having responsibilities removed or being given trivial tasks to do;
- shouting at staff;
- persistently undermining an individual in front of others or in private;
- blocking promotion;
- regularly and deliberately ignoring or excluding individuals from work activities;
- cyber bullying – abuse through email or social media platforms;
- 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;
- persistently displaying offensive, intimidating or malicious behaviour towards an individual and/or teams
- someone at the same or more junior level as you regularly overruling your authority

This is not an exhaustive list. However, it should be noted that there are many actions that do not amount to bullying, such as:

- fair and reasonable criticism of performance or behaviour;
- constructive feedback;
- not being invited to meetings where not required; and
- being placed on a performance capability procedure or not passing probation, where performance is not of an appropriate standard.

Harassment

Harassment is defined under the Equality Act 2010 as unwanted conduct related to an individual's protected characteristics that has the purpose or effect of violating the claimant's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive

environment for them.

The protected characteristics are:

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

Harassment at work on any grounds is unlawful under the Equality Act 2010 and is a criminal offence.

Examples of harassment include:

- *Verbal*: crude language, open hostility, offensive jokes, suggestive remarks, innuendoes, rude or vulgar comments, malicious gossip and offensive songs.
- *Non-verbal*: wolf-whistles, obscene gestures, sexually suggestive posters/calendars, pornographic material (both paper-based and generated on a computer, including offensive screensavers), graffiti, offensive letters, offensive e-mails, text messages, offensive objects, offensive objects, flags and emblems
- *Physical*: unnecessary touching, patting, pinching or brushing against another employee's body, intimidating behaviour, assault and physical coercion.
- *Coercion*: pressure for sexual favours (e.g., to get a job or be promoted) and pressure to participate in political, religious or trade union groups, etc.
- *Isolation*: non-cooperation and unreasonable exclusion from meetings or exclusion from social activities.
- *Intrusion*: following, pestering, spying, etc.

An individual's conduct can be considered harassment whether or not it is intended to offend. For instance, what they may consider a joke may be offensive to someone else. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others.

Academy procedure for dealing with bullying and harassment

The Academy recognises the sensitive nature of bullying and harassment. The Academy wants all individuals to feel confident that their complaint against any other individual will be taken seriously and action will be taken as quickly as possible.

Where possible and appropriate, the Academy encourages individuals to resolve concerns about bullying or harassment informally before taking the formal route. This can be done through the informal route as outlined below. If an individual (or group) experiences any form of bullying or harassment or is witness to such, they should not presume that management are aware and should raise concerns with any of the representatives listed under stage 1 below. Assuming others do not have knowledge will ensure that nothing is overlooked as many incidents will not be visible to those not impacted.

Stage 1: Taking advice and guidance

Staff who believe they are being bullied or harassed may wish to discuss their situation before deciding what action to take. The Academy understands that a complaint may be with a line manager, Director or any other individual, and therefore staff can discuss any workplace issues with any of the following representatives:

- Member of the HR team
- Directors

- Appointed Academy Trustees or Fellows (vicepresident@raeng.org.uk or president@raeng.org.uk)
- Authorised Trade Union representative if you belong to one

Confidentiality when taking advice will be maintained as far as possible. However, the Academy has an overall legal duty of care to ensure the safety of all staff and other individuals who may be adversely affected by the alleged harasser's/ bully's behaviour. The Academy therefore reserves the right to investigate a situation if the circumstances are serious enough, even if the member of staff or individual does not wish to take the complaint further.

Stage 2: Resolving problems through an informal route

Everyone working for the Academy can use the informal process to resolve their bullying or harassment concerns. You can do this with the support of other colleagues or management or with an authorised Trade Union representative (if the matter appears more serious given the nature of the allegation or impact, then the formal route can be considered in consultation with the HR team).

The Academy advises individuals to try to resolve their complaints as early as possible, to reduce their stress and worry, possibly with the other person involved. It is important to remember that the other person may be unaware of their behaviour and the impact it has on the complainant. Informal feedback from the complainant will give the person a better understanding and opportunity to change or stop their behaviour.

In the first instance, it is best for the complainant to speak to the other person to explain the situation and how it has made them feel. It can be helpful to describe the day, place, meeting or event that took place, so the other person is clear about their concerns. This opportunity should be used to ask the person to change or stop their behaviour. A member from the HR team or other representatives listed above can be used to do this if the complainant feels unable to speak to the person themselves.

The informal stage will not result in any formal internal investigation or disciplinary action but is intended to enable both parties to resolve the matter in a timely and satisfactory manner. All parties will be supported throughout this process.

Stage 3: Mediation

An independent third person or mediator can sometimes help resolve harassment or bullying issues. Mediation is a voluntary process where the mediator helps two (or more) people in dispute to find a solution to the issue that they can both agree to. All parties need to be willing to participate if mediation is to be an option. The mediator does not take sides or tell those in dispute what to do.

Mediation can be a good way of dealing with bullying, discrimination or harassment situations depending upon the nature of any allegations. Mediation is used to resolve disagreements around workplace relationships. Advice on mediation should be sought from the HR team.

Counselling and mental health support is available through the employee assistance programme by contacting 0800 048 2702.

Stage 4: Formal Stage for employees

Many concerns can be dealt with through the routes listed above before moving to the formal stage. Where informal resolution is not appropriate or where the outcome has been unsatisfactory, employees may raise the matter formally using the *Academy's Grievance Policy and Procedures* ([Grievance Policy & Procedure](#)). The grievance process will be undertaken swiftly and confidentially while ensuring the rights and protecting the identities of the complainant and the alleged harasser or bully.

The HR team will act on serious matters raised with all parties concerned and agree on the appropriate course of action, confidentially while ensuring the rights and protecting the identities of the complainant and the alleged harasser or bully.

Stage 4: Formal Stage – non-employees

Some complaints may involve non-employees as either complainant or alleged harasser or bully. For employees experiencing bullying or harassment, they should report the matter promptly to their line manager (who can seek support or guidance from the HR team).

Where the alleged harasser or bully is an employee or Fellow, but the complainant is not, the alleged behaviours will be investigated as below. Following the outcome of the investigation, the investigating manager and HR will decide whether it is necessary to address the matter more formally in accordance with the Academy's Disciplinary Policy and Procedure for staff ([Disciplinary Policy](#), [Disciplinary Procedure](#)) or the Code of Conduct for Fellows ([Fellows' Code of Conduct](#)).

Where the complainant is a member of staff, but the alleged harasser or bully is not, the Academy will act in accordance with this policy. Sanctions will depend on the relationship of the individual to the Academy. The response may involve such measures as exclusion from future Academy activities. In other cases, termination of contracts and/or removal from the list of accepted suppliers may be appropriate.

The failure of a manager (or other) to inform the HR team of a complaint by a member of staff concerning a third party may also be grounds for a grievance using the Academy's Grievance Policy and Procedures ([Grievance Policy & Procedure](#)). Some complaints will not involve staff or Fellows as either complainant or alleged harasser or bully. For instance, there may be incidents involving two participants at an Academy event, witnessed by or reported to staff. The appropriate sanction will be applied (such as barring from future events) where a complaint is upheld following investigation.

Bullying and harassment are already covered by our grant conditions as instances of misconduct that should be notified to the Academy as funder. The Academy will be adding extra conditions to underline our expectations of grant receiving organisations (or individuals) around bullying and harassment and to highlight routes for failures to live up to these expectations to be reported to the Academy. Confirmed offences will be sufficient grounds to terminate awards, and failure to suitably investigate alleged offences may lead to an organisation's eligibility being suspended.

Stage 5: Investigations – Non-employees

The HR team will appoint someone (from a different team or department and ideally agreed by both parties) unconnected with the allegations to investigate them in an independent and objective manner (guidance and support will be provided to the individual from the HR team). Investigations will be carried out in accordance with confidentiality rules with sensitivity and with due respect for the rights of both the complainant and the alleged harasser. Everyone involved in the investigation, including witnesses, will be informed that the interview is confidential and that they must not discuss the complaint with colleagues or friends. Breach of confidentiality will result in disciplinary action or other sanctions if the individual is external to the Academy.

The investigation will focus on the facts of the complaint. Notes and meeting minutes will be kept of all stages of the investigation and those interviewed will receive notes of the interview to agree. Parties will not be required to repeat distressing or sensitive details any more than is necessary. Consideration will be given to ensuring that the complainant and the alleged harasser are not required to work together whilst the complaint is under investigation.

The Academy will take all reasonable steps to ensure that staff and witnesses involved in the process will not be ridiculed or victimised. **Victimisation is illegal under the Equality Act 2010** and no staff will be victimised for making, or assisting a colleague in making, a complaint, even if it is not upheld, as long as it is made in good faith. All parties will be supported throughout this process.

We aim to resolve matters as quickly as possible but will balance that with the need to be thorough so the aim is that any stage of the procedure should not normally take more than one month. Where circumstances dictate that more time may be required to resolve the matter, all parties will be promptly informed as appropriate.

Where appropriate, consideration may be given for a short period of absence (paid) or time away from the workplace if a member of staff needs to recover from any after effects resulting from bullying or harassment. The HR team must be consulted about this in the first instance.

Examples of possible (outcomes)

Where a grievance is upheld, the Academy will consider the views of the complainant when deciding what appropriate action should be taken. This may involve:

- moving the harasser to another position (if a suitable position is available).
- moving the complainant to a different place or post if the complainant wishes (we will not require the complainant to move if this is not acceptable).
- offering the complainant counselling and reasonable time off to enable them to recover from the effect of the harassment

Formal action will be taken using the Disciplinary Policy and Procedures ([Disciplinary Policy](#), [Disciplinary Procedure](#)). All parties will be informed in writing of the outcome

within ten working days (taking into account the need for confidentiality).

Thereafter, the matter will be dealt with as follows:

- The HR team will follow up in writing as soon as reasonably possible with details of the conclusion and;
- Check in on the well-being of the complainant and any other participants involved while offering further support as appropriate

The Academy will ensure that the complainant is not penalised whether directly or indirectly for bringing a complaint and the situation will be monitored to ensure that the harassment has stopped.

If a complaint is unfounded or not made in good faith, for example a malicious complaint, this will be treated as disciplinary misconduct.

General guidance

No audio or video recordings of any kind can be made at any meetings either remotely or in the office; unless this is pre-agreed for the purpose of a workplace adjustment with clear guidance on use and disposal. Written notes can be recorded. Any breach of these rules may result in disciplinary action.

Risks of bullying and harassment should be considered and addressed in planning activities such as highlighting this policy.

Staff training and awareness

In addition to this policy, the Academy recognises that there are other ways we can help create a positive working environment for our employees and one that is free from bullying and harassment. As part of our commitment, the Academy will ensure that there are appropriate and regular communication, training and awareness sessions organised by HR for employees to:

- Help prevent bullying and harassment occurring in the workplace and ensure employees understand their responsibilities and the Academy's expectations
- Understand how to seek advice and guidance, know how to raise complaints and are confident they will be handled effectively
- Are aware of the Academy's approach to diversity and inclusion throughout our work
- Receive training and awareness sessions for all staff at all levels;
- Have access to the staff handbook including relevant employee guides and management guides
- Are encouraged to attend and participate in briefing meetings such as all staff meetings and staff inductions

An annual review of any bullying and harassment cases at the Academy will be provided to the Senior Leadership Team by the HR team (with briefings for the Leadership Team and Staff Consultative Committee if appropriate and being mindful to ensure case confidentiality is retained).

The Academy will also communicate its bullying and harassment policy to Fellows.

Attendees at events and activities will be expected to adhere to the anti-bullying and harassment policy. This, along with other key policies, will be made available for viewing as part of the event registration process.

Risks of bullying and harassment should be considered and addressed in planning activities and events. Particular thought should be applied for international travel and for off-site, informal or residential events. Examples of risk mitigation measures might include:

- briefing to event participants on the Academy's policy
- circulation of a code of conduct to participants
- ensuring that large parties selected by other organisations for Academy events have a suitably briefed and responsible person appointed from that organisation
- planning around staff numbers and venue security

Resources and sources of support

Employer Support Organisations

1. ACAS – [Bullying and Harassment at Work, Guide for Managers and Employers](#)
2. CIPD – [Bullying and Harassment, information and guidance](#)
3. Equality and Human Rights Commission – [information on Harassment](#)

Membership Organisations (these organisations provide information around protected characteristics and strategies and campaigns to challenge and overcome discrimination)

1. [Employers Network of Equality & Inclusion](#)
2. [Business in the Community – Diversity Campaigns](#)
3. [InterEngineering](#)
4. [AFBE](#)
5. [WISE Campaign](#)
6. [Women's Engineering Society](#)

Charities that support people being bullied or harassed

1. [Women's Aid](#)
2. [Bullying UK](#)
3. [Stonewall](#)
4. [Anti-Bullying Ambassadors Programme](#)
5. [Samaritans](#)
6. [Safeline](#)

Academy policies

[Grievance Policy & Procedure](#)

[Disciplinary Procedure](#)

[Fellows Code of Conduct](#)

Document control

This policy has been approved and authorised by:

Name:	Sharon Noble
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