Selsey Community Forum
Bullying, Harassment and Sexual Harassment Policy

Introduction

Selsey Community Forum is committed to providing a working environment in which everyone is treated with dignity, fairness and respect. Bullying, harassment, sexual harassment and victimisation are unacceptable and will not be tolerated.

This Policy explains the standards expected within Selsey Community Forum, the steps taken to prevent inappropriate behaviour and the arrangements for raising and addressing concerns. Selsey Community Forum will take appropriate preventative steps to reduce the risk of bullying and harassment and will take all reasonable steps to prevent sexual harassment in accordance with applicable legal requirements. This Policy should be read alongside Selsey Community Forum's Equality, Diversity and Inclusion, Grievance, Disciplinary, Whistleblowing and other relevant policies and procedures.

Scope

This Policy applies to employees of Selsey Community Forum and, where appropriate, to workers, contractors, agency workers, consultants, Trustees, volunteers and others undertaking work on behalf of Selsey Community Forum

It applies to behaviour:

- in the workplace;
- when working remotely or from home;
- during business travel;
- at training, conferences or external meetings;
- at work-related social events;
- through email, telephone or messaging services;
- through social media or work-related online groups; and
- in other situations connected with work.

The Policy may also apply to inappropriate behaviour by third parties including clients, customers, service users, suppliers, contractors and members of the public.

What is Bullying?

Bullying is unwanted behaviour that is offensive, intimidating, malicious or insulting, or an abuse or misuse of power that undermines, humiliates or causes harm to another person.

Bullying may be:

- verbal;
- physical;
- written;
- online;
- visual; or
- carried out through actions or exclusion.

Examples may include:

- insulting or humiliating someone;
- persistent unjustified criticism;
- intimidating or threatening behaviour;
- deliberately excluding someone or withholding information they reasonably need;
- spreading malicious rumours;

- abusing a position of authority;
- repeatedly undermining someone's work without reasonable justification;
- offensive jokes or comments; or
- inappropriate messages or online behaviour.

A single serious incident may constitute bullying, although bullying can also involve a pattern of behaviour.

Reasonable and appropriate management action will not normally amount to bullying simply because an employee finds it difficult or unwelcome. Managers are entitled to set reasonable standards, provide constructive feedback, manage performance, allocate work and take legitimate management action provided this is done appropriately and fairly.

Bullying is not, by itself, a specific offence under the Equality Act 2010, although bullying behaviour may amount to unlawful discrimination or harassment depending on the circumstances.

What is Harassment?

Under the Equality Act 2010, harassment may occur where there is unwanted conduct related to:

- age;
- disability;
- gender reassignment;
- race;
- religion or belief;
- sex; or
- sexual orientation;

which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. When considering the effect of conduct, relevant factors include:

- the individual's perception;
- the other circumstances of the case; and
- whether it was reasonable for the conduct to have that effect.

Harassment may occur even where the person responsible did not intend to cause offence. An individual may also be affected by harassment even where the conduct was not specifically directed towards them.

Behaviour does not need to relate to the complainant's own protected characteristic. For example, an individual may experience harassment because of conduct concerning somebody else's race, religion, sexual orientation or another relevant protected characteristic.

A single serious incident may amount to harassment.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples may include:

- unwelcome sexual comments or jokes;
- sexual or suggestive remarks;
- intrusive questions about someone's sex life or relationships;
- unwanted touching or physical contact;
- displaying or sharing sexual images or material;
- sexual gestures;
- unwanted invitations or propositions;
- repeated requests for dates after a person has declined;
- sexually explicit messages, emails or online content;
- comments about someone's body or appearance of a sexual nature;
- sexualised behaviour at work-related social events; or
- inappropriate sexual content in work-related messaging or social media groups.

Sexual harassment can occur between people of any sex or gender. Conduct may amount to sexual harassment even where it was intended as a joke or where similar behaviour has previously appeared to be accepted.

It is also unlawful in certain circumstances to treat somebody less favourably because they rejected or submitted to sexual harassment.

Victimisation

Selsey Community Forum will not tolerate victimisation or retaliation against anyone because they have:

- raised a genuine complaint of bullying, harassment, sexual harassment or discrimination;
- supported another person in raising a concern;
- provided information or evidence;
- acted as a witness;
- made an allegation relating to equality rights; or
- otherwise exercised or supported another person's legal rights.

Victimisation may itself result in disciplinary action.

Third-Party Harassment

Bullying or harassment may be carried out by someone who is not employed by Selsey Community Forum. Third parties may include:

- clients;
- customers;
- service users;
- suppliers;
- contractors;
- visitors;
- conference or event attendees; or
- members of the public.

Selsey Community Forum will take appropriate steps to identify and reduce foreseeable risks of third-party harassment. Employees who experience or witness inappropriate behaviour from a third party are encouraged to report it.

Depending on the circumstances, Selsey Community Forum may take action including:

- speaking to the third party or organisation concerned;
- issuing warnings about behaviour;
- changing working arrangements;
- providing additional support or security measures;
- reviewing contractual or service arrangements;
- restricting or ending contact;
- removing an individual from premises;
- reporting conduct to another organisation or authority; or
- taking other appropriate preventative or protective action.

Employees will not be expected simply to tolerate harassment because it is carried out by a customer, client, service user or other third party.

Preventing Sexual Harassment

Selsey Community Forum recognises that preventing sexual harassment requires proactive action rather than responding only after an incident has occurred. Selsey Community Forum will take all reasonable steps to prevent sexual harassment. Depending on the nature of the organisation and the risks involved, preventative measures may include:

- assessing where and how sexual harassment could occur;
- considering risks arising from third parties;
- maintaining clear policies and reporting arrangements;
- providing employees with more than one appropriate route for raising concerns;
- providing appropriate training and awareness;
- ensuring managers understand how to respond to concerns;
- reviewing workplace culture and working practices;
- taking appropriate action where concerns arise;
- monitoring patterns or recurring risks;

- reviewing arrangements following incidents; and
- taking additional preventative action where required.

Preventative arrangements will be proportionate to Selsey Community Forum's size, activities, workforce and identified risks.

Sexual Harassment Risk Assessment

Selsey Community Forum will consider the risk of sexual harassment as part of its preventative arrangements. Relevant factors may include:

- lone or isolated working;
- night working;
- work-related social events;
- alcohol at work-related events;
- customer or service-user contact;
- power imbalances;
- travel or overnight stays;
- particular working environments;
- online or remote working;
- social media or messaging groups;
- previous complaints or incidents; and
- other circumstances that may increase the likelihood of inappropriate behaviour.

Where risks are identified, reasonable preventative measures will be considered. Risk assessments should be reviewed where circumstances materially change or where an incident suggests that existing controls may not be sufficient.

Standards of Behaviour

Everyone covered by this policy is expected to:

- treat others with dignity and respect;
- consider the impact of their behaviour on others;
- avoid bullying, harassment, sexual harassment and discriminatory conduct;
- respect reasonable personal and professional boundaries;
- avoid inappropriate conduct through electronic communications and social media;
- cooperate with investigations and preventative measures; and
- raise serious concerns where appropriate.

Managers and Trustees with management or governance responsibility have an additional responsibility to model appropriate behaviour and respond appropriately to concerns that are raised or come to their attention.

Raising a Concern Informally

An employee who believes they are being bullied or harassed may, where they feel comfortable doing so, raise the issue informally. This may involve:

- explaining to the person concerned that their behaviour is unwelcome and asking them to stop;
- speaking with a manager;
- asking another appropriate person to assist with an informal conversation; or
- considering mediation where appropriate and agreed.

Employees are **not required to confront the person concerned personally** before making a formal complaint. Informal resolution may not be appropriate where:

- the allegation is serious;
- the employee feels unsafe or uncomfortable;
- there is a significant imbalance of power;
- previous informal action has not resolved the matter; or
- formal investigation is otherwise considered appropriate.

Raising a Formal Complaint

An employee may raise a formal complaint where they do not wish to pursue informal resolution, informal action has been unsuccessful, or the seriousness of the allegation warrants formal consideration. The complaint should normally be raised with the employee's manager or another appropriate designated person.

Where the complaint concerns the employee's manager, or the employee does not reasonably feel able to raise it with them, the complaint may be raised with another appropriate manager, a Trustee or another nominated person. The employee should provide as much information as they reasonably can, which may include:

- details of the behaviour complained of;
- dates or approximate dates;
- individuals involved;
- witnesses;
- relevant messages, documents or other evidence; and
- any action already taken.

A complaint will not be rejected simply because the employee cannot provide documentary evidence.

Immediate Protective Measures

Where appropriate, Selsey Community Forum may consider temporary arrangements while a complaint is being investigated. These may include:

- changes to reporting arrangements;
- temporary changes to work location or duties;
- remote working;
- changes to shifts or working patterns;
- instructions regarding contact between individuals;
- suspension on full pay where appropriate; or
- other proportionate measures.

Such arrangements are precautionary and do not amount to a finding that misconduct has occurred.

Where possible, Selsey Community Forum will avoid placing an unnecessary burden on the person who has raised the concern.

Investigation

Formal allegations will normally be investigated where this is necessary to establish the relevant facts. Depending on the circumstances, the investigator may be an appropriate manager, Trustee, external HR adviser or other suitably independent person. The investigation may include:

- meeting with the person raising the complaint;
- meeting with the person whose conduct is the subject of the complaint;
- interviewing relevant witnesses;
- reviewing documents, correspondence, messages, CCTV or other relevant evidence; and

considering any other information reasonably relevant to the allegations.

Investigations will be conducted fairly and without unreasonable delay. The precise timescale will depend on the nature and complexity of the matter. Both the complainant and the person whose conduct is being investigated will be expected to cooperate reasonably with the investigation.

Investigation Meetings

The purpose of an investigation meeting is to gather information and understand the circumstances. Individuals attending an investigation meeting will normally be told:

- the purpose of the meeting;
- the nature of the matters being considered;
- who is conducting the investigation;
- what further steps may be required; and
- how the information provided may be used.

The individual will have a reasonable opportunity to provide information, identify witnesses and submit relevant evidence. A written record may be made of the meeting.

Accompaniment

There is not normally a statutory right to be accompanied at a purely investigatory meeting. However, Selsey Community Forum may allow an individual to be accompanied by a work colleague, trade union representative or other appropriate companion where this would assist the process. Selsey Community Forum will consider requests for additional support where this is appropriate, including as a reasonable adjustment for a disabled employee.

Where a meeting constitutes a formal grievance or disciplinary hearing and the statutory right to accompaniment applies, the individual will be entitled to be accompanied in accordance with applicable law and Selsey Community Forum's relevant procedure.

Witnesses and Evidence

Witnesses should provide truthful and accurate information and cooperate reasonably with an investigation. Where witness statements or other evidence are relied upon in reaching a formal decision, relevant information may need to be disclosed to the individuals involved to ensure a fair process.

Selsey Community Forum will consider requests for witness identities to be withheld, but anonymity cannot be guaranteed. Where anonymity is considered necessary, Selsey Community Forum will balance the witness's concerns against the need to conduct a fair investigation.

Confidentiality

Complaints of bullying and harassment will be handled sensitively and with appropriate regard to confidentiality. Information will only be shared with individuals who have a legitimate need to know for the purpose of:

- providing support;
- investigating or addressing the complaint;
- conducting disciplinary or grievance proceedings;
- complying with legal or regulatory obligations; or
- taking appropriate preventative action.

Absolute confidentiality cannot be guaranteed. Employees involved in a complaint or investigation are expected to respect the privacy of others and not discuss the matter unnecessarily. Nothing in this policy is intended to prevent an individual from:

- seeking appropriate professional or medical support;
- obtaining legal advice;
- consulting a trade union representative;
- making a protected disclosure;
- reporting a criminal offence; or
- exercising another legal right.

Outcome of a Complaint

Following an investigation, Selsey Community Forum will determine what action, if any, is appropriate. Where reasonably practicable, the complainant and the person whose conduct has been investigated will be informed that the process has concluded and provided with an appropriate summary of the outcome.

The amount of information that can be shared may be limited by confidentiality and data protection requirements. Possible outcomes may include:

- no further action;
- informal management action;
- facilitated discussion or mediation where appropriate;
- training or guidance;
- changes to working arrangements;
- additional preventative measures;
- action under Selsey Community Forum's Disciplinary Policy; or
- another reasonable response.

Where disciplinary action is considered against the person complained about, this will be dealt with under the appropriate disciplinary procedure.

Appeals and Further Concerns

Where a formal complaint has been handled as a grievance, the complainant will normally have an opportunity to appeal the grievance outcome in accordance with Selsey Community Forum's Grievance Policy. Any appeal should explain the grounds on which the employee believes the outcome should be reconsidered.

Where disciplinary action is taken against another employee, that employee's right of appeal will be dealt with under Selsey Community Forum's Disciplinary Policy.

The complainant will not normally have the right to appeal another employee's disciplinary sanction, although they may raise concerns about how their original complaint was handled.

Complaints Not Upheld

No employee will be subjected to disciplinary action merely because a complaint is not upheld or because there is insufficient evidence to substantiate it. Employees are encouraged to raise genuine concerns without fear of retaliation.

Where there is clear evidence that an individual has knowingly made a false allegation in bad faith or has deliberately fabricated evidence, the matter may be considered under Selsey Community Forum's Disciplinary Policy.

A complaint that is mistaken, unsubstantiated or not upheld will not, by itself, be treated as malicious.

Criminal Conduct and External Reporting

Some forms of bullying or harassment may also constitute criminal conduct. Where appropriate, an individual may choose to report matters to the police or another relevant authority.

Selsey Community Forum may also consider whether an external referral is appropriate where there is a legal, safeguarding or regulatory obligation to do so. Internal procedures will be managed having regard to any external investigation where relevant.

Support

Selsey Community Forum recognises that involvement in a bullying or harassment complaint can be stressful for everyone concerned. Depending on the circumstances and resources available, support may include:

- discussions with a manager;
- occupational health support;
- an Employee Assistance Programme or counselling, where available;
- temporary working adjustments;
- reasonable adjustments;
- signposting to external support; or
- other appropriate measures.

Support will be considered separately from the outcome of any complaint.

Whistleblowing

Certain concerns relating to harassment or other wrongdoing may also amount to a protected disclosure under whistleblowing legislation where the relevant statutory requirements are met. Nothing in this Policy prevents an employee or worker from raising an appropriate concern under Selsey Community Forum's Whistleblowing Policy.

Employees and workers will not be subjected to unlawful detriment for making a protected disclosure.

Data Protection and Record Keeping

Information relating to bullying or harassment complaints will be processed in accordance with applicable data protection legislation. Selsey Community Forum may maintain appropriate records of:

- complaints;
- investigations;
- meetings;
- evidence;

- outcomes;
- actions taken; and
- preventative measures.

Records will be retained securely and only for as long as reasonably necessary in accordance with Selsey Community Forum's applicable retention arrangements. Access will be restricted to individuals with a legitimate need to know.

Training and Awareness

Selsey Community Forum will provide appropriate information, instruction or training to support the prevention of bullying, harassment and sexual harassment. Training may cover:

- expected workplace behaviour;
- bullying and harassment;
- sexual harassment;
- third-party harassment;
- reporting concerns;
- manager responsibilities;
- bystander awareness or intervention where appropriate; and
- how complaints should be handled.

Training and awareness arrangements will be proportionate to Selsey Community Forum's size, activities and identified risks and will be refreshed where appropriate.

Trustees or others who may be involved in receiving complaints, investigating concerns or making decisions should receive appropriate guidance or training for the role they are undertaking.

Monitoring and Preventative Review

Selsey Community Forum will periodically review its approach to preventing bullying, harassment and sexual harassment. This may include consideration of:

- reported incidents and complaints;
- themes or patterns;
- third-party risks;
- workplace culture;
- employee feedback;
- training effectiveness;
- risk assessments;
- working practices; and
- lessons arising from previous incidents.

Where weaknesses or additional risks are identified, reasonable preventative action will be considered.

Review

This Policy will be reviewed at least annually and sooner where there is a significant incident, material change in working arrangements, identified change in risk, or relevant change in legislation, ACAS or EHRC guidance.

Version Control

Version Number	Date of Update	Amendments
1.0	October 2025	Annual Review
2.0	October 2026	Reviewed and updated in line with current Equality Act 2010 requirements, ACAS and EHRC guidance and forthcoming October 2026 harassment protections