

Bullying & Harassment Policy

**Also includes Discrimination,
Victimisation & Exclusion**

2025

Data Classification: Public

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Policy Owner	People
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Introduction

The way we work sets us apart, as a different kind of bank. Our Code of Conduct defines how we will demonstrate to all our stakeholders that our colleagues behave in line with our Ethical Policy and co-operative values to deliver the right customer outcomes and comply with regulatory requirements.

Developing a culture in which every single one of us feels valued and is able to add value is vital to our success. We achieve this by having a workplace free from bullying, harassment, discrimination, victimisation and exclusion, so that all colleagues have the opportunity to really be the very best that they can be.

This policy explains:

- how we expect our colleagues to behave
- what to do if you see or experience inappropriate behaviour
- how we can all help to create a respectful working environment

Scope

This Policy applies to all colleagues, as well as agency workers and contractors.

Our Responsibilities

Leader Responsibilities:

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- Lead by example and create an environment of mutual respect between colleagues which is free from bullying, harassment, discrimination, victimisation and exclusion
 - Ensure all your team are aware of the standards required of them and act in accordance with these standards at all times
 - Lead an environment where colleagues feel able to raise issues informally or formally without fear of reprisal
 - If you observe any inappropriate behaviour in your teams act promptly and address it
 - Provide support to colleagues who raise concerns and to those who have any allegations raised against them
 - Take any issues or concerns raised to you seriously. Listen to colleagues and investigate accordingly
 - Ensure colleagues are not treated less favourably for raising any issues or concerns.

Colleague Responsibilities:

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- Ensure you have read and understood this policy
 - You are required to respect others and you must not behave in ways which may cause offence, or which in any way could be considered to be harassment, bullying, discrimination, victimisation and exclusion
 - To create a culture where bullying, harassment, discrimination and exclusion doesn't happen in our workplace and feel empowered to challenge it or report it if you see it happening.

Definitions

Bullying

Bullying is behaviour from a person or group that's unwanted and makes someone feeling uncomfortable including feeling:

- Frightened
- less respected or put down
- made fun of
- upset
- isolated

Examples of bullying in the workplace could include:

- spreading a false rumour about someone
- putting someone down in meetings
- not allowing someone to go on training courses, but allowing everyone else to
- giving someone a heavier workload than everyone else
- excluding someone from team social events

Harassment

By law, harassment is when bullying or unwanted behaviour is related to any of the following (known as 'protected characteristics' under the Equality Act 2010):

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

As with bullying, the person being harassed might feel:

- disrespected
- frightened
- humiliated
- made fun of
- offended
- threatened
- isolated

For it to count as harassment, the unwanted behaviour must have either:

- violated the person's dignity, whether it was intended or not
 - created a hostile environment for the person, whether it was intended or not
- The law on harassment also applies to:
- a person being harassed because they are thought to have a certain protected characteristic when they do not
 - a person being harassed because they're linked to someone with a certain protected characteristic
 - a person who witnesses harassment because of someone else's protected characteristic and is upset by it

Discrimination

Discrimination is where an individual is treated less favourably because of a 'protected characteristic':

- Direct discrimination occurs when a person treats or would treat another less favourably than others and the treatment is because of a 'protected characteristic'
- Discrimination by association occurs when a person treats another less favourably because of that person's association with another person who has a 'protected characteristic'.
- Discrimination by perception occurs when a person treats another person less favourably because that person is thought to have a 'protected characteristic', irrespective of whether they do or not
- Indirect discrimination occurs when an organisation has a provision, principle or practice which, although applied equally to all colleagues, has the effect of disadvantaging some individuals more than others (for example due to their age, sex, religion or belief etc.) and which cannot be objectively justified

Victimisation

Victimisation is being treated unfairly because you made or supported a complaint to do with a 'protected characteristic', or someone thinks you did.

Banter

- Banter can be described as a “playful and friendly exchange of teasing remarks”. It could be teasing someone about how they look or speak for example. Having a bit of banter at work can be a good thing providing it is not causing offence.
- Knowing where to draw the line in the right place can sometimes be difficult and what can be harmless fun to one person may not be to another so we need to be aware of how it can make others feel.
- When banter makes another person feel uncomfortable or upset or if it continues even when a colleague has asked for it to stop, this becomes more serious and unacceptable.
- Banter does not just impact those within a banter conversation but others around who overhear a conversation may be affected

These types of unfair treatment can be experienced in different ways. For example, depending on the type of treatment, it might:

- be a regular pattern of behaviour or a one-off incident
- happen face to face, on social media, in emails or phone calls
- be spoken or written words, imagery, graffiti, gestures, jokes, pranks or unwanted physical behaviour
- happen in the workplace or at work social events
- not always be obvious or noticed by others

Note that the examples in the lists are not exhaustive



Confidentiality

Confidentiality is very important throughout all aspects of this Policy.

Every colleague has a personal responsibility to respect the high level of confidentiality that is required.

Discussions, investigations and written records should remain confidential in line with Data Protection. Any breach of confidentiality by a colleague may give rise to formal action being taken in line with the Disciplinary Policy

Where any colleague reports any incidents of bullying, harassment, discrimination, victimisation or exclusion, we will maintain confidentiality where possible.

Firm Management or Cause for Concern

It is important to remember that leaders have the right to manage and address any concerns they may have in a constructive manner. An example would be a discussion regarding poor performance and the consequences if this continues.

Bullying, harassment, discrimination or victimisation should not be confused with legitimate, constructive and fair feedback regarding your performance or behaviour at work. It is important to note that there is a clear distinction between management behaviour which is not acceptable, and management behaviour which is fully justified and reasonable.

Examples of what is acceptable include:

- A legitimate instruction to complete a task by a reasonable deadline
- Justified and reasonable feedback in private for poor performance or conduct or the start of formal action (Disciplinary, Performance Improvement, Sickness Absence), where this is justified in accordance with Bank's Policies and procedures.

Examples of what is unacceptable:

- Instances of providing unjustified, non-constructive feedback
- Belittling colleagues in private or in public
- Not treating all colleagues consistently

Third Parties

Colleagues might raise issues about matters not entirely within the control of the Bank, such as client or customer relationships. Such issues should be treated in the same way as grievances within the Bank, with the leader investigating as far as possible and taking action if required via relevant relationship managers / third parties. Grievances are taken seriously and action will be taken to protect our colleagues.

Process

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the Grievance procedure.

If you feel you are being treated unfairly or receiving inappropriate treatment, don't remain quiet about it. We encourage you to raise it so it can be addressed immediately. If possible, try to explain to the person responsible how their behaviour makes you feel and ask them to stop. They might not realise the impact of their words or actions. But if you don't feel able to speak to the person, talk to your Leader about the problems you're having. If you don't feel you can speak to your Leader, or your complaint is about them, you can speak to your Leader's Leader or another Leader in your department. You may also speak to your trade union if you're a member or you can contact our Concern at Work service.

Colleagues who make such allegations in good faith will not be victimised or treated less favourably as a result. If it is found that you have been bullied or harassed, the perpetrator will be dealt with under the Disciplinary Policy and it may constitute gross misconduct.

If, however, it is found that you have bullied or harassed someone, made false allegations, or treated a colleague inappropriately we may deal with this under the Disciplinary Policy and it may constitute gross misconduct. We will always take a strict approach to serious breaches of this Policy.

Support



If you feel that you're being bullied, harassed, discriminated, victimised or excluded it can sometimes be difficult to decide how you want to deal with it. It can help to talk this through with someone.

Also, if you've been accused of bullying, harassment, discrimination, victimisation or exclusion and this is a false allegation, we appreciate this can be a difficult time.

You can call our Employee Assistance Programme for confidential and independent support and advice. If you are a member of the Trade Union, you can also contact your union for advice and support.

You should also advise the leader who is investigating any complaint about any necessary support you may require. This may be related to your role or working environment.