



Statement and Purpose of Policy

1. Cobras AP (the Employer, we or us) is committed to providing a work environment free from harassment and bullying and ensuring that all staff are treated, and treat others, with dignity and respect.
2. This Policy does not form part of any employment contract and the Employer retains the right to amend it at any time, in its absolute discretion.

What Does This Policy Cover?

3. This Policy covers harassment, victimisation and bullying which takes place within and outside of the workplace, including on business trips, work-related social functions or events.
4. This Policy applies to all staff, irrespective of seniority, tenure and working hours, including all directors and officers, casual or agency staff, trainees, interns, fixed-term staff, volunteers, consultants and contractors. It also covers harassment and bullying by third parties, such as customers, suppliers or visitors to the business premises.

What is Harassment?

5. Harassment is defined as unwanted conduct related to a relevant protected characteristic (within the Equality Act 2010) which has the effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.
6. Unlawful harassment may involve conduct of a sexual nature or it may be related to age, race, colour or nationality, ethnic or national origins, sex, gender reassignment, sexual orientation, disability, religion or belief, pregnancy or maternity.
7. Harassment can arise in some cases even though the person complaining does not actually possess a protected characteristic but is perceived to have it or associates with someone who does.
8. A person may also be subject to harassment even if they were not the intended target.
9. **Examples of harassment include, but are not limited to:**
 - Use of insults or slurs based on a protected characteristic or of a sexual nature

- Physical or verbal abuse, threatening or intimidating behaviour
- Unwelcome physical contact such as touching, hugging, brushing past
- Mocking or belittling someone's disability, appearance, accent
- Offensive or intimidating comments made verbally, by email or online
- Requests for sexual acts, suggestive behaviour, vulgar comments
- Repeated or unwelcome requests for dates or social contact
- Comments about body parts or sexual preference
- Displaying or distributing offensive material (printed or digital)
- Deliberate exclusion from conversations or activities
- Threats to 'out' someone's sexual orientation
- Implied or explicit suggestions linking employment progression to sexual compliance
- Racist, sexist, homophobic or ageist remarks or jokes
- Obscene gestures, posters, flags or graffiti
- Isolation from shared spaces, meetings or events

10. Important points to note:

- A single incident can constitute harassment
- Long-standing, unchallenged behaviour can also count
- Intention is not required — only the effect
- You don't have to say the behaviour is unwelcome for it to be harassment
- Everyone must take responsibility for ensuring their conduct is appropriate

What is Victimisation?

11. Victimisation occurs where a member of staff suffers detrimental treatment for making or supporting a complaint of harassment or bullying in good faith.
12. Cobras AP will not tolerate victimisation and may treat it as a disciplinary matter.

What is Bullying?

13. Bullying is behaviour (physical, verbal or non-verbal) that is offensive, intimidating, malicious or insulting, involving a misuse of power and leaving the target feeling vulnerable, upset or humiliated.

14. Examples of bullying include, but are not limited to:

- Unfair treatment
- Inappropriate or belittling comments about performance
- Physical or psychological threats
- Excessive or oppressive supervision



- Abuse of authority
- Constantly shifting goals to ensure failure
- False accusations
- Deliberate exclusion from communication or meetings

15. Reasonable performance-related feedback or management instructions will not be considered bullying.

What If You Are Being Bullied or Harassed?

- 16. If possible, raise the issue informally with the person concerned.
- 17. If not, speak to your line manager or HR for confidential support.
- 18. If the behaviour continues or informal resolution isn't appropriate, you may make a formal complaint.

19. A formal written complaint should include:

- Who is responsible
 - Nature of the behaviour
 - Specific examples with dates/times
 - Names of any witnesses
 - Any actions you've already taken
- 20. You will be invited to a meeting with HR to discuss the matter.
 - 21. You may be accompanied by a colleague or trade union representative.
 - 22. Your complaint will be investigated confidentially by someone uninvolved.
 - 23. If the complaint is upheld, appropriate action will be taken under the Disciplinary Policy. If not, steps will still be considered to manage working relationships.
 - 24. You will be informed of the outcome.

Appeal

- 25. If you are dissatisfied with the decision, you may appeal in writing within 10 working days.
- 26. You'll be invited to a hearing within five working days.
- 27. Your appeal will be heard by an impartial person not previously involved.
- 28. The outcome will be communicated within 24 hours and will be final.

Supporting and Protecting Those Involved



29. Anyone making or supporting a complaint in good faith will not suffer any form of victimisation or retaliation.
 30. Retaliation will be treated as misconduct.
 31. If a complaint is found to be deliberately false or malicious, disciplinary action may be taken.
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Keeping Records

32. Complaints and outcomes may be recorded in personnel files, with documents retained in accordance with Cobras AP's Data Protection and Data Security Policy.
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Last reviewed: June 2025

