

Title of POL: Dignity at Work

Custodian: Chief People Officer

Version Number: 03

Issue date: 25.07.25

Review date: 25.07.28

**POLICY (POL)**

<b>Title of Policy</b>	Dignity at Work					
<b>What type of document is this?</b>	Policy (POL)	Policy Reference Number	HHH-POL-027			
<b>Purpose of POL</b>	<p>This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.</p> <p>It is our policy to ensure that any Dignity at Work matter is dealt with fairly and that steps are taken to establish the facts and to give employees the opportunity to respond before taking any formal action.</p> <p>This policy covers all employees, officers, consultants, contractors, casual workers, and agency workers.</p> <p>This policy does not form part of any employee's contract of employment, and we may amend it at any time. We may also vary this procedure, including any time limits, as appropriate in any case.</p>					
<b>ROLES AND RESPONSIBILITIES</b>						
Include in this section details of the key roles and associated responsibilities relevant to the document						
<b>Roles</b>	<b>Responsibility</b>					
Chief People Officer	Is responsible for reviewing and updating this policy and ensuring that the policy is communicated across the company through the Senior Management Team(s)					

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Helping Hands Managers	Is responsible for implementing and embedding this policy within all teams across the company
Helping Hands Employees	Is responsible for adhering to this policy as directed by line managers

**1.0 Confidentiality**

1.1 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Policy and Procedure.

Information about a concern by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

**2.0 Equal Opportunities Statement**

2.1 Helping Hands is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, gender, or sexual orientation.

**3.0 Discrimination**

3.1 You must not discriminate against or harass other people including current and former employees, job applicants, customers, suppliers, and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers, or other work-related contacts), and on work-related trips or events including social events. The following forms of discrimination are prohibited under this policy and are unlawful:

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- 3.1.1 **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or sexual orientation.
- 3.1.2 **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- 3.1.3 **Associative Discrimination:** treating someone less favourably because of someone else's Protected Characteristic to whom they are associated. For example, rejecting a job applicant because they are married to someone of a different race.
- 3.1.4 **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- 3.1.5 **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- 3.1.6 **Disability discrimination:** this includes any discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

#### 4.0 Recruitment and Selection

- 4.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that

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avoid discrimination. Our recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and skillset required to perform their role.

Vacancies will be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions for example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).

4.2 Where necessary, job offers can be made conditional on a satisfactory medical check.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from a member of People Support or UK Visas and Immigration.

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To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion, and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

### **5.0 Training and Promotion and Conditions of Service**

5.1 Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

### **6.0 Disabilities**

6.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your Line Manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your Line Manager may wish to consult with you and your medical professional about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

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We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

### **7.0 Part-time and Fixed-term work**

7.1 Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

### **8.0 What is Harassment**

8.1 Harassment is any unwanted physical, verbal, or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing, and grabbing.
- unwanted verbal conduct or "banter," which someone may find offensive

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- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome
- sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet).
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless).
- jokes, derogatory or stereotypical remarks about any protected characteristic, namely, Age, Race, Disability, Marital/Civil status, Gender, Gender reassignment, Sexual Orientation, Religion/Belief and Pregnancy/Maternity.
- outing or threatening to out someone as LGBTQ+.
- offensive emails, text messages or social media content; or
- mocking, mimicking, or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

### **9.0 What is Bullying**

9.1 Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined, or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal, and non-verbal conduct. Bullying may include, by way of example:

- physical or psychological threats.
- Overbearing and intimidating levels of supervision

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- Inappropriate derogatory remarks about someone's performance

Legitimate, reasonable, and constructive feedback of performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

### 10.0 If you are being Harassed or Bullied: Informal Steps

10.1 If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your Line Manager or a member of the People team who can provide confidential advice and assistance in resolving the issue formally or informally.

If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your Line Manager or a member of the People team informally for confidential advice.

If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below or refer to our Grievance Policy and Procedure.

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all employees and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

### 11.0 Protection and Support for those involved

11.1 Employees who raise concerns or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Policy and Procedure.

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If you believe you have suffered any such treatment you should inform your Line Manager. If the matter is not remedied, you should raise it formally using our Grievance Policy and Procedure or this procedure if appropriate.

We offer access to confidential counselling, which is available on request for anyone affected by, or accused of, bullying or harassment.

### **12.0 Raising a Formal Complaint**

12.1 If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your Line Manager in line with our Grievance Policy and Procedure, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns your Line Manager, you should refer it to the persons Line Manager.

You should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all employees and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

### **13.0 Formal Investigations**

13.1 We will investigate concerns in a timely and confidential manner. The investigation will be thorough, impartial, and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

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We will arrange a meeting with you, usually within seven calendar days of receiving your concern, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation. The investigating manager may arrange further meetings with you as appropriate throughout the investigation.

Where your concern is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigating manager will also meet with the alleged harasser or bully. They have a right to be told the details of the allegations against them, so that they can respond.

Where your concern is about someone other than an employee, such as a customer, supplier, or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation. Where appropriate, we will discuss the matter with the third party.

We will also consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours so as to avoid or minimise contact with the alleged harasser or bully.

It may be necessary to interview witnesses to any of the incidents mentioned in your concern. If so, the importance of confidentiality will be emphasised to them.

At the end of the investigation, the investigating manager will decide on which further steps may need to be taken, i.e. proceed to disciplinary, mediation, redeployment etc.

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#### **14.0 Action Following the Investigation**

14.1 If the investigating Manager considers that harassment or bullying has occurred, prompt action will be taken to address it.

Where the harasser or bully is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Policy and Procedure. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem.

Whether or not your concern is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.

Any employee who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under our Disciplinary Policy and Procedure.

#### **15.0 Breaches of this Policy**

15.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Policy and Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter with your Line Manager or a member of People Support.

There must be no victimisation or retaliation against employees who raise a concern about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Policy and Procedure.

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## **16.0 Appeals**

16.1 If you feel that we have not fairly considered your submissions under our Dignity at Work policy, you can request an appeal of the original decision. You should appeal in writing, stating your full grounds of appeal, to the named manager in your outcome letter within seven calendar days of the date of your outcome letter.

In your appeal submission you should clearly set out your full grounds detailing any new evidence or inconsistency in our procedures. The right to appeal is not on the basis of an outcome being 'unfair' and employees must outline (and provide) evidence the original Chairperson has not considered or been aware of which would have impacted on the original outcome

We will give you a minimum of 48 hours written notice of the date, time, and place of the appeal meeting.

The appointed appeal chair will be a more senior manager who has not dealt with the original matter. The Chairperson will be accompanied by a company representative to take minutes of the meeting.

If you raise any new matters in your appeal, we may need to carry out further investigation. If any new information comes to light, we will provide you with a summary including, where appropriate, copies of additional relevant documents and witness statements. You will have a reasonable opportunity to consider this information before the appeal hearing, and you or your companion may comment on any new evidence arising during the appeal before any decision is taken.

We may adjourn the appeal hearing if we need to carry out any further investigations in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

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Following the adjournment, the chairperson may issue their decision, however if they are unable to reach an immediate decision, they are entitled to deliberate prior to issuing their decision.

In any event, written notification of the outcome of the hearing will usually be sent to the employee within seven calendar days of the hearing, or as soon as reasonably practicable, together with an explanation of the appeal decision taken.

Following the appeal hearing we may:

- confirm the original decision
- revoke the original decision; or
- substitute a different sanction.

There will be no further right of appeal.

<b>TRAINING</b>  Is training required?	No
Details of training	N/A
<b>COMPLIANCE</b>  How is compliance within this document going to be monitored?	Compliance with this policy will be monitored by line managers and the People Team

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EQUALITY IMPACT ASSESSMENT AND PROCEDURAL INFORMATION		
	Positive/Negative/N/A	Comments
Does the document have a positive or negative impact on one group of people over another based on their:		
• Age?	N/A	
• Disability	N/A	
• Gender assignment?	N/A	
• Pregnancy and maternity (which includes breastfeeding)	N/A	
• Race (including nationality, ethnic or national origins or colour)?	N/A	
• Marriage or civil partnership?	N/A	
• Religion or belief?	N/A	
• Sex?	N/A	
• Sexual orientation?	N/A	
If you have identified any potential impact (including any positive impact which may result in more favourable treatment for one particular group of people over another), are any	N/A	

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exceptions valid, legal and/or justifiable?		
If the impact on one of the above groups is likely to be negative:		
Can the impact be avoided?	N/A	
What alternatives are there to achieving the document's aim without the impact?	N/A	
Can the impact be reduced by taking different action?	N/A	
Is there an impact on staff, customer or someone else's privacy?	N/A	
Changes since previous version	<ul style="list-style-type: none"> <li>Amended terminology to reflect the People Team</li> <li>Amended language in the discrimination examples</li> </ul>	
Who was involved in developing /reviewing/amending the document? (list titles)	Chief People Officer People Advisor Team Lead	
How confidential is this document	Restricted	Can be shared freely within Helping Hands but NOT outside
References		
Associated Documents		