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Anti-Bullying and Harassment Policy

1. Policy Statement

Universal Group is committed to providing a safe, respectful, and inclusive working environment in which all individuals are treated with dignity and respect. We operate a zero-tolerance approach to bullying and harassment in all its forms.

The company recognises that bullying and harassment can cause significant distress, anxiety, and harm to individuals and can negatively impact workplace morale, productivity, and safety. This is particularly important in the construction industry, where teamwork, trust, and clear communication are essential to maintaining safe working conditions on site.

This policy applies to all employees, directors, officers, agency workers, contractors, subcontractors, apprentices, and any other individuals working for or on behalf of Universal Group.

2. Scope and Application

This policy applies to conduct that occurs:

- In the workplace, including construction sites, offices, depots, and client premises
- During work-related activities, training sessions, or meetings
- At work-related social events
- Through work-related communications, including email, telephone, and electronic messaging
- During travel to and from work sites
- By third parties, including clients, suppliers, visitors, or members of the public

3. What is Bullying and Harassment

Harassment is defined under the Equality Act 2010 as unwanted conduct related to a relevant protected characteristic (age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity) which has the purpose or effect of:

- Violating a person's dignity, or
- Creating an intimidating, hostile, degrading, humiliating, or offensive environment

Bullying is offensive, intimidating, malicious, or insulting behaviour, or an abuse of power through means that undermine, humiliate, denigrate, or injure the recipient. Bullying can occur even where there is no protected characteristic involved.

Both bullying and harassment may be a single incident or a series of incidents and can be verbal, non-verbal, physical, or written.

4. Examples of Bullying and Harassing Behaviour

Bullying and harassment can take many forms, including but not limited to:

- Shouting, aggressive behaviour, or threatening language
- Persistent criticism or undermining of someone's work
- Spreading malicious rumours or gossip
- Exclusion from team activities, meetings, or communications

- Unfair treatment or allocation of work
- Humiliation in front of colleagues
- Physical intimidation or unwanted physical contact
- Intrusive or inappropriate questions about private life
- Offensive jokes, banter, or comments related to protected characteristics
- Displaying or sharing offensive or degrading material
- Abuse of power or position to belittle or undermine others
- Deliberately withholding information or resources needed to do the job
- Setting unrealistic deadlines or unreasonable workloads with the intent to cause distress
- Inappropriate use of disciplinary or capability procedures
- In the construction industry, bullying may also include:
- Deliberately assigning unsafe or unsuitable tasks
- Excluding someone from safety briefings or toolbox talks
- Sabotaging work or equipment
- Ignoring or dismissing legitimate health and safety concerns

Bullying and harassment are not necessarily face to face. They can also occur through written communications, email, phone, text messages, or social media.

5. Impact of Bullying and Harassment

Bullying and harassment can have serious consequences for individuals and the organisation, including:

- Anxiety, stress, and loss of confidence
- Physical and mental ill health
- Reduced performance and productivity
- Increased absenteeism and sickness
- High staff turnover
- Damage to team morale and workplace culture
- Increased risk of accidents and safety incidents on site
- Reputational damage to the company

Universal Group takes these impacts seriously and is committed to preventing and addressing bullying and harassment promptly and effectively.

6. Responsibilities

Management Responsibilities

Managers, supervisors, and site managers are responsible for:

- Promoting a culture of dignity, respect, and inclusion
- Ensuring this policy is communicated, understood, and applied consistently
- Leading by example and modelling respectful behaviour

- Taking immediate and appropriate action when concerns are raised or observed
- Supporting individuals who raise complaints
- Monitoring workplace culture and addressing any concerning behaviours early
- Conducting risk assessments of working environments to identify potential bullying and harassment risks
- Ensuring that third-party conduct is also addressed where necessary

Employee Responsibilities

All workers are expected to:

- Treat colleagues, clients, subcontractors, and others with respect and dignity
- Refrain from any behaviour that could constitute bullying or harassment
- Challenge inappropriate behaviour and support colleagues who may be experiencing bullying or harassment
- Report incidents of bullying or harassment, whether experienced personally or witnessed
- Co-operate fully with any investigations
- Maintain confidentiality during investigations

A failure by any employee to meet these responsibilities may result in disciplinary action, up to and including dismissal.

7. Reporting Bullying and Harassment

Universal Group encourages anyone who experiences or witnesses bullying or harassment to report it as soon as possible. The company will take all complaints seriously.

Informal Resolution

In some cases, individuals may feel comfortable addressing the issue informally. This may include:

- Speaking directly to the person whose behaviour is causing concern, if safe and appropriate to do so
- Seeking support from a colleague, line manager, or site supervisor
- Requesting an informal discussion facilitated by management

The company understands that informal resolution may not always be appropriate, and individuals are not required to attempt informal resolution before making a formal complaint.

Formal Reporting

Formal complaints may be made through the following channels:

- Line Manager or Site Supervisor
- A member of senior management
- A Director of the company
- By email to HR@universal-group.uk
- Reports may be made verbally or in writing. Where possible, the following details should be provided:
- Name of the alleged perpetrator(s)
- Nature of the behaviour or incident(s)
- Dates, times, and locations
- Names of any witnesses
- Any supporting evidence (e.g., messages, emails, photographs)

- Any action already taken

The company understands that individuals may feel reluctant to report bullying or harassment and will handle all complaints sensitively, fairly, and confidentially.

8. Investigation and Action

All complaints of bullying and harassment will be taken seriously and investigated promptly, fairly, and confidentially.

The investigation process will typically include:

- Acknowledgement of the complaint in writing within 5 working days
- Appointment of an impartial Investigating Officer
- Interviews with the complainant, alleged perpetrator, and any witnesses
- Collection of written statements and evidence
- A written report of findings

Where bullying or harassment is substantiated, appropriate action will be taken, which may include:

- Informal resolution measures (e.g., mediation, training, relocation)
- Formal disciplinary action, up to and including dismissal
- Action to address third-party conduct where applicable

Both the complainant and the alleged perpetrator will be informed of the outcome in writing.

If the complaint is not substantiated, the matter will be closed, but support will still be offered to the complainant if needed.

9. Protection from Victimisation

No individual will suffer victimisation, retaliation, or less favourable treatment for:

- Raising a complaint of bullying or harassment in good faith
- Supporting another individual's complaint
- Participating in an investigation

Any victimisation will be treated as a serious disciplinary matter and may result in dismissal.

10. Confidentiality

All information relating to complaints will be handled sensitively and shared only on a need-to-know basis, in line with data protection requirements and the company's duty of care.

In exceptional circumstances, where there are serious concerns about an individual's safety, welfare, or the safety of others, confidentiality may need to be breached. Where this occurs, the individual will be informed wherever possible.

11. Support for Individuals

Universal Group recognises that bullying and harassment can have a significant impact on wellbeing. Support is available through:

- Line managers and senior management
- Occupational health services
- Employee Assistance Programme (if applicable)
- External support services, including:
- **Acas Helpline:** 0300 123 1100
- **Samaritans:** 116 123
- **Mind Infoline:** 0300 123 3393

12. Training and Awareness

Universal Group will provide appropriate training and information to ensure that employees and managers understand:

- What constitutes bullying and harassment
- How to prevent it
- How to report concerns
- Their responsibilities under this policy

Training will be provided during induction and refreshed regularly, particularly for those in supervisory or management roles.

13. Monitoring and Review

This policy will be monitored regularly to ensure its effectiveness. The company will review records of complaints, outcomes, and any trends to identify areas for improvement.

This policy will be reviewed annually, as a minimum, or sooner if required by changes in legislation or organisational practice.

Signed
Richard Lowe
Managing Director

Dated 01/11/2026