



Dignity at Work Policy

After reading this document, please complete the table on the final page and return it to maria@myriadsecurity.co.uk

Update to policy, 14 October 2024

New guidance from the Equality and Human Rights Commission (EHRC) states that as of 26 October 2024, the law requires employers to take reasonable steps to prevent sexual harassment of workers.

Myriad Security Ltd has a Dignity at Work policy in place, but this document contains updated information, in line with the guidance from the EHRC. Further information about the EHRC guidance can be found at [EHRC publishes updated workplace sexual harassment guidance ahead of change to law | EHRC \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/equality-law/equality-guidance/equality-guidance-workplace-sexual-harassment)

Policy statement

Myriad Security Limited (hereafter referred to as 'The Company') seeks to provide a work environment in which all workers are treated with respect and dignity, and that is free of harassment and bullying based upon a worker's race, colour, ethnic origin, nationality, national origin, religion or belief, gender, pregnancy or maternity, sexual orientation, gender reassignment, age, marital or civil partnership status or disability. These are known as "protected characteristics".

Employees have a duty to co-operate with the Company to make sure that this policy is effective in preventing harassment or bullying. Workers must not harass, bully or intimidate other workers on these grounds. Sexual harassment will not be tolerated and is unlawful. Harassment on the grounds of any protected characteristic not only contravenes the Company's policy but it may also constitute unlawful discrimination. Such behaviour will be treated as potential gross misconduct under the Company's disciplinary procedure and could render the worker liable to summary dismissal. Workers should bear in mind that they can be held personally liable for any act of unlawful harassment. Workers who commit serious acts of harassment may also be guilty of a criminal offence.

All workers are responsible for conducting themselves in accordance with this policy and the Company will not condone or tolerate any form of harassment, bullying or intimidation, whether engaged in by workers or by outside third parties who do business with the Company. The Company will take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its staff.

Workers should draw the attention of their line manager to suspected cases of harassment, bullying or intimidation.

Workers must not victimise or retaliate against a colleague who has made allegations or complaints of harassment or who has provided information about such harassment. Such behaviour will be treated as potential gross misconduct under the Company's disciplinary procedure. Staff should support colleagues who suffer such treatment and are making a complaint.

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, for example, business trips and work-related social events.

This policy will be reviewed every six months, and its effectiveness will be regularly monitored and changes will be implemented where required.

Harassment and Bullying

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or

humiliates an employee.

A worker unlawfully harasses another employee if they or a third party engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee, and because of that other employee's rejection of or submission to the conduct, they treat that other worker less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the protected characteristic of a third party with whom the worker is associated and not on the worker's own protected characteristic, or if it was directed at someone other than the worker, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that a worker has a particular protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the person intended to offend. Something intended as a 'joke' or as 'office banter', or as being a 'compliment' or 'just being friendly', may offend another person. This is because different workers find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend a worker will always constitute harassment without the need for the worker having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular worker, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the worker has made it clear, by words or conduct, that such behaviour is unacceptable to them. A single incident can amount to harassment if it is sufficiently serious.

Harassment also occurs where, on the ground of the worker's rejection of or submission to unwanted conduct of the kind specified above, a person treats the worker less favourably than they would treat them had they not rejected, or had submitted to, the unwanted conduct.

Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour covered by this policy include, but are not limited to, the following:

- Unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature.
- Subjection to obscene or sexually suggestive comments or gestures, or comments or gestures based on a protected characteristic.
- The offer of rewards for going along with sexual advances or threats for rejecting sexual advances.
- Jokes or pictures of a sexual nature, or aimed at a protected characteristic.
- Demeaning comments about a worker's appearance.
- Questions, jokes, or demeaning or suggestive comments about a person's sex life.
- Questions, jokes, or demeaning or suggestive comments about a person's gender and/or pronouns.
- The use of nick names related to a worker's gender, sexual orientation, gender reassignment, race, religion, age or disability.
- Picking on or ridiculing a worker.
- Isolating a worker or excluding them from social activities or relevant work-related matters.

Third party harassment

Everyone deserves to feel safe in their workplace, and the Company will take all reasonable steps to prevent sexual harassment of its workers. Third party harassment will not be tolerated, and workers are encouraged to report any incidences of harassment from third parties, including clients, customers, and members of the public.

Reporting and investigation of complaints

Any worker who believes they have been or are being harassed or bullied in violation of this policy, or who wishes to report an incident of harassment or bullying, should report the situation to their line manager. If the worker does not wish to speak to their line manager, they can instead contact Maria Dines at maria@myriadsecurity.co.uk, or can contact Colin Huggett, Director of X-Clusive Events, at colin@x-clusive.co.uk.

All allegations of harassment or bullying will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of harassment from workers.

While the Company encourages workers who believe they are being harassed or bullied to notify the offender (by words or by conduct) that their behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical.

The Company also recognises that there may be some situations where the perceived bullying or harassment is of too serious a nature not to be brought to the attention of line managers.

In the event that such informal, direct communication is either ineffective or impractical or the situation is too serious to be dealt with informally, the following steps should be followed in reporting a complaint of harassment or bullying, whether that complaint is against a fellow worker or against a third party such as a client, customer, contractor or supplier

Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.

All allegations of harassment or bullying will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, the worker will be interviewed and asked to provide a written witness statement setting out the nature and details of the incident or complaint and the basis for it. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation. For example, the identity of the complainant and the nature of the allegations must be revealed to the alleged harasser so that they

are able to fairly respond to the allegations. The Company reserves the right to arrange for another manager to conduct the investigation other than the manager with whom the worker raised the matter.

The Company will also invite the worker to attend at least one meeting at a reasonable time and place at which their complaint can be discussed and the worker must take all reasonable steps to attend that meeting. The worker has the right to be accompanied at that meeting by either a trade union official or a fellow worker of their choice.

Once the investigation has been completed and after the meeting with the worker has taken place, the worker will be informed in writing of the outcome and the Company's conclusions and decision as soon as possible. The worker will also be notified in writing of their right to appeal against the Company's decision if they are not satisfied with it. The Company is committed to taking appropriate action with respect to all complaints of harassment or bullying which are upheld. If appropriate, disciplinary proceedings will be brought against the alleged harasser (see below).

If the worker wishes to appeal against the Company's decision, they must appeal in writing to a more senior manager or to a Director of the Company within five working days of the Company's decision. On receipt of such a request, a more senior manager or a Director (who may not be the person to whom the worker addressed their appeal) shall make arrangements to hear the appeal at an appeal meeting and at that meeting the worker may again, if they wish, be accompanied by either a trade union official or a fellow worker of their choice. The worker must take all reasonable steps to attend that meeting. Following the meeting, the relevant manager or Director will inform the worker in writing of the Company's final decision on the worker's appeal.

If a worker's complaint is upheld and the harasser remains working for the Company, the Company will take all reasonable steps to ensure that the worker does not have to continue to work alongside the harasser if they do not wish to do so. The Company will discuss the options with the worker.

If a worker's complaint is not upheld, arrangements will be made for the worker and the alleged harasser to continue or resume working and to repair working relationships.

Workers will not be penalised or victimised for raising a complaint. Workers will not be penalized for raising a complaint, even if it is not upheld, unless the complaint was both untrue and made in bad faith.

Alternatively, the worker may use the Company's grievance procedure to make a complaint.

Disciplinary action

Any worker of the Company who is found to have harassed another worker in violation of this policy will be subject to appropriate disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as potential gross misconduct and could render the worker liable to summary dismissal.

In addition, line managers who had knowledge that such harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

Aggravating factors such as abuse of power over a more junior colleague will be taken in to account in deciding what disciplinary action to take.

Training

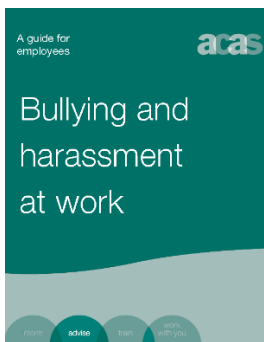
The Company will take such measures as may be necessary to ensure the proper training, supervision and instruction to enable line managers to deal more effectively with complaints of bullying and harassment. Line managers will be responsible for ensuring they promote dignity at work within the departments for which they are responsible.

The Company will also provide training to all workers to help them understand their rights and responsibilities under this policy and what they can do to create a work environment that is free of bullying and harassment.

Data protection

The Company may periodically conduct confidential staff surveys and other forms of monitoring, in order to assess how well the dignity at work policy has become part of the workplace culture. When carrying out any monitoring, the Company will ensure that personal data is handled in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of personal data will constitute a data breach and should be reported immediately to the Company's Data Protection Officer in accordance with the Company's data protection policy. Reported data breaches will be investigated and may lead to sanctions under the Company's disciplinary procedure.

Further information from ACAS



ACAS (The Advisory, Conciliation and Arbitration Service) has produced a guide entitled “Bullying and harassment at work”. The full document can be found at

<http://www.acas.org.uk/media/pdf/r/l/Bullying-and-harassment-at-work-a-guide-for-employees.pdf>

Please sign below to show that you have received and understood this and all other relevant documentation/briefing provided to you; and that you have been given the opportunity to raise any points with the Myriad Security Ltd management team.

I confirm that I have received the following briefing documentation from Myriad Security Ltd:

Dignity at Work Policy document

Key Points – Dignity at Work document

A link to the ACAS document “Bullying and harassment at work”

and confirm that I have read and understood these documents.

Name in capitals	
Signature	
Date	