Created: 23 Oct 2025
Approved by: The SNJO Board of Trustees
Version: 1.0
Last Amendment Date: 24 Oct 2025
Next Review Date: 23 Oct 2026

ANTI-HARASSMENT AND BULLYING POLICY

PART 1: KEY POINTS

Our commitment	We are committed to a working environment free from bullying and harassment and where everyone is treated with dignity and respect. We will not tolerate bullying or harassment.
What are bullying and harassment?	Part 2 of this policy explains what bullying and harassment are. Everyone who works for us must read Part 2 of this policy and ensure they understand it. Discriminatory harassment is unlawful. Bullying and harassment by employees may be a serious disciplinary offence.
Who is covered by this policy?	This policy applies to our employees, officers, volunteers, consultants, contractors, casual workers and agency workers. However, some aspects of this policy are different for employees and other workers – these are explained in the policy.
Your responsibility	You must not bully or harass any other person in the course of your work for us, including any of our employees, workers, customers, clients or suppliers. In addition, anyone with management responsibility must set an appropriate standard of behaviour and take reasonable steps to ensure those they manage adhere to this policy. Managers must respond appropriately to complaints of bullying or harassment.
Reporting bullying and harassment	Part 3 of this policy explains how to report bullying and harassment. We understand that this can be difficult in some situations, however, we encourage you to report incidents.
Complaints process	We treat all allegations of bullying and harassment seriously and sensitively. Our process for handling individual complaints is explained at Parts 4-6 of this policy. The process in this policy does not apply to collective grievances i.e. grievances raised by a representative on behalf of two or more employees. We will decide on the process for these on a case-by-case basis.
Confidentiality	Information relating to bullying and harassment complaints (including the identities of all involved) must be kept confidential and only shared on a 'need to know' basis. Any breach of confidentiality by an employee may result in disciplinary action.

Support	Upon request, the following support can be made available to employees who raise a complaint, accused of bullying or harassment, or are witnesses: • Assistance from a Trade Union Representative If you are not our employee, we will confirm the support available to you in the event of a complaint. External support may also be available from other organisations, such as The Equality and Advisory Support Service.
Disability	If any aspect of this policy causes you difficulty on account of a disability, please inform one of our Orchestra Managers: SNJO Manager: Mark Deering - md@snjo.co.uk SNYJO Manager: Jude Rolls – jr@snjo.co.uk
Contracts and amendments	This policy does not form part of any contract with us (including any contract of employment) except to the extent that it imposes obligations on you. We will review this policy regularly, monitor its effectiveness and implement any necessary changes. We may amend this policy at any time and may vary it as appropriate to a particular case. An up-to-date copy will be available from www.snjo.co.uk.

PART 2: WHAT IS BULLYING AND HARASSMENT?

What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power than can make a person feel vulnerable, upset, undermined, humiliated or threatened. Power can mean, for example, being in a position of authority, personal strength or the power to coerce through fear or intimidation.

Bullying can be physical, verbal or non-verbal.

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

Examples of bullying

Examples of bullying include:

- Ridiculing or demeaning others, particularly junior colleagues
- Physical or psychological threats
- Using offensive or intimidating language on social networking sites
- Overbearing and intimidating levels of supervision
- Unjustifiably excluding colleagues from meetings, communications or social networking groups.

What is harassment?

Harassment is where someone is subjected to unwanted conduct which has the purpose or effect of violating their dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Harassment is unlawful if the unwanted conduct is related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, or if the conduct is of a sexual nature. However, our position is that harassment is unacceptable even if it does not fall into these categories.

Harassment can also occur if an individual is treated less favourably because they reject or submit to harassment of a sexual nature or harassment related to gender reassignment or sex.

Conduct of a sexual nature is covered in our separate Sexual Harassment Policy, and this policy does not apply in those circumstances.

Examples of harassment

If it meets the definition above, harassment can include:

- **Unwanted physical contact**, such as touching, pinching, pushing and grabbing.

- **Verbal conduct**, including jokes or 'banter' (even if not directed at a particular individual). For example, racist, sexist, ageist or homophobic jokes or derogatory or stereotypical comments about a particular ethnic or religious group or gender, or about disability.

- **Non-verbal conduct**, including sending emails or texts with offensive material; posting offensive material on social media; displaying offensive material in the workplace (including computers, desks, mobile phones); offensive gestures; basing a decision about a person (e.g. turning someone down for a promotion) on the fact that they rejected or submitted to harassment related to gender reassignment or sex; disclosing or threatening to disclose someone's sexual orientation.

These are examples and other conduct might amount to harassment.

Our separate Sexual Harassment Policy gives examples of sexual harassment.

Where?

Bullying and harassment can occur:

- **Inside and outside the workplace.** This can include business trips and work-related social events.

- **In person (face-to-face) or via other means.** This includes via email, text or social media and whether it is via our IT systems or equipment or otherwise.

- **During and outside working hours.**

By whom?

Bullying and harassment may be carried out by:

- **Someone working for us.** This includes employees, volunteers, officers, consultants, contractors, casual workers and agency workers.

- **Third parties.** This includes customers, service users, suppliers and visitors to our premises. With a view to preventing harassment by third parties, we [*insert details, for example:* include warning notices in emails; have recorded messages at the beginning of incoming telephone calls; display posters in prominent locations in our workplaces; make clear to suppliers that we will not tolerate harassment].

- **Someone who holds the characteristic to which the conduct relates.** For example, harassment of a woman related to her sex can be carried out by another woman.

One-off incidents of harassment

A one-off incident can amount to harassment.

Does harassment need to be directed at the alleged victim?

No. Harassment can, for example, be witnessed or overheard.

A victim does not need to possess the characteristic to which the conduct relates – for example, they could be harassed by comments about a disability, even if they are not disabled.

What if conduct has been accepted in the past or is commonplace?

Conduct can still be 'unwanted' (and therefore amount to harassment) if it has been accepted in the past, is acceptable to others, or is common in the working environment.

What if there was no intention to cause offence?

Harassment can occur if a person:

- intends to cause offence; **or**
- does not intend to cause offence, but this is the **effect** of their conduct – in these cases, in deciding whether there has been harassment, we will consider the alleged victim's perception; whether it is reasonable for the conduct to have the alleged effect; and any other relevant circumstances.

Legal liability and disciplinary offence

Bullying and harassment (including by third parties) can result in legal liability for our business and the perpetrator.

Bullying and harassment by employees can amount to misconduct or gross misconduct and in serious cases may lead to dismissal without notice. This includes:

- at work and work-related events
- against a colleague or other person connected to us outside of work (for example, via social media)
- against anyone outside of work if relevant to your suitability for your role.

Aggravating factors, such as abuse of power over a more junior colleague, may be relevant in deciding what disciplinary action to take.

We encourage reporting

We encourage you to report bullying and harassment, including by third parties (such as customers).

You will be protected from victimisation as explained at Part 5 of this policy.

Anonymous reporting

You can make an anonymous complaint via Alan Dewar KC (ad@snjo.co.uk), one of our Board members. If you make a complaint in this way, the information will be treated in strict confidence.

Informal steps

You may feel able to tell an alleged bully or harasser that their behaviour is not welcome and that it offends you or makes you uncomfortable. However, you don't have to do this and we appreciate that whether it is appropriate will depend on the circumstances, for example, the nature of the bullying or harassment and individuals involved. You can use the other reporting options (anonymous reporting or a formal complaint) without first taking informal steps or after you have taken informal steps.

If you feel that a matter can be dealt with informally, but don't want to speak directly to the individual yourself, you can contact an Orchestra Manager or any member of the Board.

If we become aware of an allegation informally, we may still decide that a formal investigation is appropriate.

Formal complaint

If you consider that you have been subjected to bullying or harassment, you can make a formal complaint in writing via:

- If you are our employee: follow the process in our Grievance Policy.
- If you are not our employee: follow the process in our Complaints Policy.

If your complaint involves the person you are due to write to, you should send your complaint to the Chair of the Board, Simon Best (sb@snjo.co.uk) instead.

Please include as much information as possible, for example: the name of the alleged bully / harasser; nature of the bullying / harassment; where and when it took place; any witnesses; any action taken so far.

Other policies

Our Equality, Inclusion and Diversity Policy and Whistleblowing Policy may also be relevant to a complaint. We have a separate Sexual Harassment Policy. You can find these policies at www.snjo.co.uk. . If you are not sure which policy to use, please speak to one of our Orchestra Managers in the first instance:

- SNJO Manager: Mark Deering - md@snjo.co.uk
- SNYJO Manager: Jude Rolls – jr@snjo.co.uk

Criminal allegations

If you have been a victim of physical violence or any other crime, it is open to you to contact the police at any time.

Bullying or harassment of someone else

You may witness or become aware of bullying, harassment or victimisation of someone else. This includes bullying and harassment of (and by) colleagues, other workers, clients, suppliers and visitors. We encourage you to act in this situation – what is appropriate will depend on the circumstances but might include:

- Intervening if you feel able to do so
- Supporting the victim to report it
- Reporting it yourself – you can report this to an Orchestra Manager or any Board Member.
- Co-operating in any investigation.

You will be protected from victimisation as explained at Part 5 of this policy.

PART 4: INVESTIGATIONS

When will we investigate?

If we receive a formal complaint (or, in some cases, where we become aware of bullying or harassment allegations informally) we will carry out an investigation.

Suspension and working arrangements

If you are our employee and you are accused of bullying or harassment, we may need to suspend you from work while we investigate. Suspension of this kind is not a disciplinary penalty and does not imply that we have reached a decision about the allegations. The provisions of our Disciplinary Policy regarding suspension will apply.

If suspension is not appropriate, or the individual accused is not our employee, we may consider temporary changes to working arrangements during an investigation.

Appointing an investigator and decision-maker

We will appoint an investigator and decision-maker.

The decision-maker will usually be one or more members of the Board.

Fact-finding meetings

The investigator will invite the complainant, accused person and any potential witnesses to separate fact-finding meetings to hear their account of events, if they are our employees. If any individuals involved are not our employees, we will consider whether fact-finding meetings with them are appropriate in the circumstances.

If you are accused of bullying or harassment and you are our employee, we will inform you of the allegations before the fact-finding meeting. You must co-operate fully and promptly with the investigation. This may include giving us the names of witnesses, disclosing relevant documents or other evidence and allowing us to review them and attending fact-finding meetings.

Further investigations

The investigator will carry out further investigations as appropriate. This may vary from case to case but could include reviewing documents, CCTV footage, emails, phone records, text messages and / or social media.

Investigation report

The investigator will produce an investigation report and send this to the decision-maker.

False information

Anyone making a complaint or giving evidence in support of it will not be subjected to disciplinary action or another detriment simply because a complaint is not upheld. However, for employees, we may take disciplinary action under our Disciplinary Policy if you:

- provide false information as part of an investigation under this policy; **and**
- you do so in bad faith i.e. you know the information is false.

In serious cases, this may amount to gross misconduct leading to dismissal without notice. If you are not our employee, we will consider if any action is appropriate in the circumstances.

Review of investigation report

The decision-maker will review the investigation report.

Disciplinary process: if the alleged bully / harasser is our employee

If the decision-maker considers that there are sufficient grounds for a disciplinary hearing with the alleged bully or harasser, they will:

- Write to the complainant to confirm that further steps are being taken and that they will be in touch as soon as possible to advise of the outcome of the complaint.
- Follow the procedure and other terms of our Disciplinary Policy to arrange and chair a disciplinary hearing with the alleged bully or harasser; reach a decision; and inform the alleged bully or harasser of the outcome. The appeal process in our Disciplinary Policy will apply.

Bullying or harassment can amount to misconduct or gross misconduct, and in serious cases may lead to dismissal without notice.

If the decision-maker does not consider that there are sufficient grounds for a disciplinary hearing, they will confirm in writing to the alleged bully or harasser that no disciplinary action will be taken.

Action: if the alleged bully or harasser is not our employee

If the alleged bully or harasser is not our employee, it will not be appropriate for us to take disciplinary action, but the decision-maker will consider if any action is appropriate in the circumstances.

For third parties, we may consider warning them about their behaviour, and/or notifying their employer or ceasing to work with them.

Communicating the outcome of the complaint

After the steps above, the decision-maker will:

- Arrange a meeting with the complainant to inform them of their decision in relation to the complaint and reasons for this.
- Write to the complainant to confirm that decision and reasons.
- Confirm if action will be taken. In some cases, we may inform the complainant of the nature of any action taken to address their specific complaint and any measures put in place to prevent a similar event happening again, however, this will not always be possible or appropriate.

For employees, the appeal process in our Grievance Policy will apply. For non-employees, there will be no appeal process.

Ongoing working relationships

Whatever the outcome, we will consider how best to manage ongoing working relationships. This could include mediation, counselling, training and / or changing duties, work location or reporting lines of one or both parties.

Other steps

If bullying, harassment or victimisation occurs, we will consider what steps we can take to prevent it happening again. These may include, for example, updating policies or providing further staff training.

Victimisation

You will not be victimised or subjected to any detriment (such as being denied or excluded from opportunities at work) or retaliation for making an allegation (or giving evidence or information as part of an investigation) in good faith. If you believe that you have been, you can raise it under our Grievance Policy (if you are an employee), or our Complaints Policy (if you are not our employee).

Victimisation or retaliation by employees can amount to misconduct or gross misconduct, and in serious cases may lead to dismissal without notice.

Timescales

Any steps under this policy will be taken within a reasonable timescale. What is reasonable will depend on the circumstances including the scope and complexity of any investigation, availability of personnel and whether a disciplinary process is necessary. If there is any significant delay, we will tell you the reason for this.

Recording and notes of meetings

Unless we agree otherwise, no electronic recordings may be made of any meetings under this policy.

A note-taker will usually be present at meetings to take notes. We will send attendees a copy of the notes.

Meeting arrangements – if you are our employee

If you are the complainant or alleged bully or harasser, we will send you a written invitation to any meeting, advising of the date, time and place of the meeting and your right to be accompanied (if applicable). We will usually give three to five working days' notice of any meeting.

We will arrange meetings at a reasonable time and location, usually during working hours in a private room in the workplace. If appropriate, we may arrange meetings outside of the workplace or working hours.

Companions at meetings

If you are not our employee, we will decide whether a companion is appropriate on a case-by-case basis.

If you are our employee, you may bring a companion as follows:

- Fact-finding meeting with complainant or alleged bully or harasser: **Yes**
- Fact-finding meeting with potential witness: **Yes**
- Disciplinary hearing or outcome meeting: **Yes**
- Outcome meeting with complainant: **Yes**.

A companion can be a work colleague, trade union representative or official employed by a trade union. You should inform the person chairing the meeting of your choice of companion in good time before the meeting, so arrangements can be made for them to attend.

A companion may address the meeting by explaining and summing up your case and responding on your behalf to any views expressed at the meeting. They may confer with you (privately if you wish) during the meeting but may not answer questions on your behalf, address the meeting if you do not wish them to do so or prevent the person chairing the meeting from explaining their case.

It is your responsibility to ensure that your chosen companion is willing and available to accompany you to the meeting. If your chosen companion is unavailable on the first proposed date, you may suggest a reasonable alternative time and date so long as it is not more than five working days after the original date.

Attending meetings

You should make every effort to attend meetings. If you cannot attend you should inform us immediately and explain the reasons for this.

If you have a good reason for not attending, we will usually re-arrange a meeting on the first occasion. If you are not able to attend the rearranged meeting, we may give you the opportunity to make written representations.

If you are unable to attend due to ill-health and it appears to us that this is likely to remain the case for an extended period, we may require you to co-operate in obtaining a medical report to determine whether you are fit to attend. If you are fit to attend, we may proceed in your absence but may give you the opportunity to make written representations.

If an employee accused of bullying or harassment fails to attend a fact-finding meeting without good reason, we may treat this as misconduct.

Criminal allegations

If a complaint under this policy is also the subject of a criminal investigation or proceedings, we will not usually put the processes in this policy on hold pending the outcome of those. If you are unable, or have been advised not to, attend a meeting or say anything about a pending criminal matter, we may reach a decision based on the evidence available.

Contact details

SNJO Manager	Mark Deering +447446286412 md@snjo.co.uk
SNYJO Manager	Jude Rolls +447462 331921 jr@snjo.co.uk
Chair of the SNJO Board	Simon Best sb@snjo.co.uk
Contact for Anonymous Complaints (Board Member)	Alan Dewar KC ad@snjo.co.uk