

1. Introduction

This is a policy statement setting out Lavender International's (the company) position on bullying and harassment in the workplace and apprenticeship programmes. This document is not contractual but describes the way the company is committed to promoting a fair and harmonious working environment in which everyone is treated with respect and dignity and in which no individual feels bullied, threatened or intimidated.

The aim of this policy is to prevent harassment and bullying in the workplace which includes harassment and bullying by other workers or by third parties within the workplace whether in person or via the internet.

All employees, apprentices, workers and associates of the company have the right to work in an environment which is free from any form of harassment or bullying. Harassment or bullying at work in any form is unacceptable behaviour and will not be permitted or condoned and will be viewed as a gross misconduct offence which may result in dismissal without notice.

2. Definition of Harassment

Harassment is any unwanted physical, verbal or non-verbal conduct based on sex, sexual orientation, marital or civil partnership status, gender reassignment, religion or belief, age, race or disability which affects the dignity of anyone at work or creates an intimidating, hostile, degrading, humiliating or offensive environment.

A single incident of unwanted or offensive behaviour can amount to harassment. Some examples are given below, but many forms of behaviour can constitute harassment.

Examples of harassment include:

- unwanted physical contact, ranging from touching, pushing or grabbing to punching or serious assault
- verbal or written harassment through jokes, offensive language, defamatory remarks, gossip, threats or letters
- unwelcome sexual behaviour, including unwanted suggestions, propositions or advances
- the sending or displaying of material that is pornographic or obscene, including e-mails, text messages, video clips, photographs, posters, emblems or any other offensive material
- isolation, non-co-operation at work or exclusion from social activities
- coercion, including pressure for sexual favours
- inappropriate personal contact, including intrusion by pestering or spying.

3. Definition of Bullying

Bullying is persistent, offensive, abusive, intimidating or insulting behaviour which makes the recipient feel upset, threatened, humiliated or vulnerable. Bullying can be a form of harassment and can undermine an individual's self-confidence and self-esteem and cause them to suffer stress.

Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- shouting at or humiliating others
- high-handed or oppressive levels of supervision
- unjustified, offensive and/or insulting remarks about performance
- excluding employees from meetings, events or communications without good cause
- physical or emotional threats

Bullying can occur in and outside workplace, at events connected to the workplace, such as social functions or business trips and online through webinars, conference calls and social media.

4. Responsibilities

Director/Management Team

The Directors/Management Team have collective responsibility for the content, implementation and review of this policy. They are also responsible for leading by example and encouraging good practice across the organisation.

HR Leader

The director with day-to-day responsibility for HR is required to ensure that this policy is distributed to all employees, apprentices and operatives. They shall also ensure that managers understand the company's responsibilities and that the provisions of the policy are implemented on a day to day basis.

Managers/Supervisors

All employees who have line management responsibilities shall ensure that those employees, apprentices and operatives under their control comply with the requirements of this policy. They shall ensure that any breaches of the policy are investigated, recorded and, where necessary, formal disciplinary

action takes. Where in doubt the matter should be referred to the Operations Director.

All employees, apprentices, workers and associates of the company are asked to read this policy and are expected to comply with the provisions at all times.

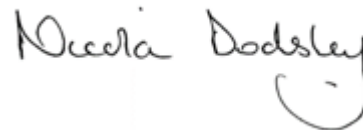
5. Procedure

Complaints of bullying or harassment should be raised through the company's Appeals and Complaints Procedure (AQD 05)

Approved/Authorised by:



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Managing Director



Nicola Dodsley
Operations Director