Document Control Page	
Name of policy	**Dignity and Respect Code of Conduct**
Date effective:	30 June 2025
Purpose and scope of the policy	• To set out the expected behaviours of staff, alliance members project colleagues, volunteers, work experience placements, contractors, external consultants, visitors, guests, agency staff, trustees, etc. • Promote a culture of dignity, respect and inclusion at work. • Clearly define acceptable and unacceptable behaviours. Provide support for those who experience or witness bullying, harassment, sexual harassment, victimisation, discrimination, or other inappropriate conduct. • Set out the procedures for resolving concerns, both informally and formally, in line with the Sustain's polices.
Sustain department	Human Resources
Applicable legislation, guides, standards and references	• Equality Act 2010 • The Worker Protection (Amendment of Equality Act 2010) Act 2023, which came into effect on October 26, 2024 • ACAS bullying and harassment guidance
Policy author	Danila Ardé, Head of HR and Operations
Policy contributors	Senior Management Team: • Kath Dalmeny, Chief Executive (SLT) • Sarah Williams, Programmes Director (SLT) • Glen Tarman, Policy Director (SLT) • Quoc-Anh Tran, Head of Finance • Gavin Dupee, Head of Digital and Design • Danila Ardé, Head of HR & Operations
Consultation	Non-contractual policy, expected behaviours
Approved by	Kath Dalmeny, Chief Executive
Date last approved	N/A
Substantive changes since last update and reason for update	This policy replaces the Dignity and Respect Code of Conduct dated September 2024. It now includes external stakeholders in the scope and includes a chapter on the preventative action

	and support and a new reporting form for Sexual Harassment incidences for both internal and external reporting.
Impact assessment by Sustain	This policy applies to all staff, alliance members project colleagues, volunteers, work experience placements, contractors, external consultants, visitors, guests.
Review cycle	Annually, or earlier if required by applicable legislation
Next review date	June 2026
Policy location	Sustain Intranet and shared drives for all staff
Policy Drive	HR Drive

Contents

Introduction

This policy is designed to set out the standards of behaviour the Charity expects of all its employees and others working within and with the organisation in order to create a working environment where everyone is treated with dignity, respect and in line with the Charity's values.

Along with the Charity's policies on managing grievances, disciplinary and reporting issues, this policy provides information about the support available to staff and the processes to be followed for dealing with discrimination, harassment, sexual harassment, bullying, victimisation and inappropriate behaviour.

The Equality Act 2010 provides particular protection against discrimination and harassment on the basis of protected characteristics. It prohibits direct and indirect discrimination, harassment, and victimisation. The Act promotes equal pay and gender equality, requires reasonable adjustments for individuals with disabilities, and mandates employers to prevent and address discrimination and harassment in the workplace.

All colleagues must abide by the charity's Dignity and Respect Code of Conduct and must avoid behaving in any way that is likely to cause offence or harm to others.

In the Charity's workplace, at events and during activities, everyone is expected to behave in a way that protects colleagues, attendees, guests, support staff or any other third parties present.

The Charity has separate Sustain events policy and guidance (also covers travel and overnight accommodation). The organisation has a separate policy addressing safeguarding for children and vulnerable adults

Protected characteristics

Protected characteristics as set out by The Equality Act 2010

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

The Charity is committed to providing an inclusive and supportive working environment for all our staff. This includes providing an environment and culture free from intimidation, harassment, sexual harassment, bullying, discrimination, or abuse from colleagues or third parties.

This policy also covers unacceptable behaviour away from the workplace such as on business trips, work related events and social functions and includes the behaviour of third parties such as contractors, agency workers, suppliers, customers and members of the public or visitors to our premises or events.

The Charity recognise unacceptable behaviour can create a work environment that interferes with job performance, undermines job security and an individual's sense of self-worth, can cause serious stress related health issues, lead to higher rates of absenteeism and damage the Charity's reputation as an employer.

The Charity has a zero-tolerance approach to any form of discrimination, harassment, sexual harassment, bullying and victimisation or any other discriminatory and inappropriate behaviours at any level of the charity.

Any acts or accusations of discrimination, bullying, harassment and sexual harassment or victimisation will be dealt with as a serious matter.

Discrimination

Discrimination is defined by ACAS as the unfair treatment of people or groups based on protected characteristics.

There are two different types of discrimination direct and indirect.

Direct Discrimination is when someone is put at a disadvantage and treated less fairly because of a protected characteristic.

There are three types of direct discrimination and this can happen to a person who:

- has a protected characteristic.
- has a connection with someone with a protected characteristic, called 'discrimination by association'.
- is thought to have a protected characteristic when they do not, called 'discrimination by perception'.

Indirect Discrimination is when a working practice, policy or a rule is applied to everyone but puts one person or group at a disadvantage because of a protected characteristic.

Harassment

Harassment is defined as any unwanted physical, verbal or non-verbal conduct about any of the protected characteristics as listed in the Equality Act 2010, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples of harassment can include:

- **intrusive behaviour** by pestering, spying or stalking;
- **derogatory comments** or jokes about a person's race, religion or nationality;
- **derogatory comments** or jokes about a person's sexual orientation or disability; and

- **offensive remarks or gestures** aimed at mocking someone with a disability or impairment.
- **Hate crime** is a hate incident that reaches the threshold of a criminal offence.
- **Stalking** is persistent unwelcome contact such as following a person, watching or spying on them. leaving repeated or alarming messages via voice mail, email or text; or forcing contact through any means, including social media. The conduct might appear innocent in isolation but when carried out repeatedly might curtail a victim's freedom and cause significant alarm, harassment or distress.

Sexual Harassment

Sexual harassment is unwanted behaviour or conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. The Equality Act 2010 protects employees, workers, contractors, and job applicants against sexual harassment at work.

Examples of sexual harassment can include:

• unwanted behaviour that violates someone's dignity, whether it was intended or not;
• unwelcome sexual advances, such as touching or standing too close;

• creating an intimidating, hostile, degrading, humiliating or offensive environment, whether it was intended or not;

• flirting, gesturing or making sexual remarks about someone's body, clothing or appearance;

• asking questions about someone's sex life;

• telling sexually offensive jokes;

• sexual pranks or teasing;

• sexual advances;

• whistling, leering;

• making sexual comments or jokes about someone's sexual orientation or gender reassignment;

• giving sexually suggestive gifts;

• displaying or sharing pornographic or sexual images, or other sexual content; and

• touching someone against their will, for example hugging them.

What some people might consider as joking, 'banter' or part of their workplace culture is still considered sexual harassment if the behaviour is sexual in nature and/or includes any of the behaviours listed above.

Even if the behaviour is not intended, it is the impact on the individual that must be considered.

Anyone can be a victim of sexual harassment, regardless of their sex and the sex of the harasser. What matters is that sexual conduct is unwanted and unwelcomed by the person against whom the conduct is directed.

Employees can also experience or witness sexual harassment from a supplier, customer, client, or member of the public. The Charity will take all reasonable steps to prevent this.

The Charity is committed to creating and maintaining a safe and respectful workplace environment and additionally we will take proactive measures that will be implemented to prevent sexual harassment and support the well-being of all employees.

Bullying

Whilst there is no legal definition, ACAS defines bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Power does not always mean being in a position of authority and it can also include personal strength and the power to coerce through fear and intimidation.

Bullying can take the form of physical, verbal, and nonverbal conduct. It can be experienced from manager to subordinate, subordinate to manager, peer to peer, or group of staff to individual. It can be both explicit and insidious (in other words, implied criticism rather than actually stated) and undermines the ability and confidence of the person on the receiving end.

Bullying and harassment can be a one-off or repeated acts. It can be intentional or unintentional, happen face-to-face or through other channels of communication including online platforms such as MS Teams, via telephone, written communications such as e-mail or text messages, through social media or directed through a third party.

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

Examples of bullying can include, but are not limited to:

- **spreading false or malicious rumours** about someone;
- **undermining a person's work performance** and making false claims or allegations;
- **undermining a person's self-esteem**, for example by constantly making unfavourable comparisons with others or belittling their status;
- **refusing to complete job-related tasks** with the aim of undermining someone's authority;
- **abuse of a position of authority** and undermining a person's individual dignity;
- **deliberately undermining a competent worker** by overloading or under loading them with work, constantly criticising them and setting them up to fail with tasks and goals;
- **not supporting workplace adjustments** or accommodations;
- **excluding or isolating a colleague**, not co-operating with them or victimising them;
- **overbearing supervision**, excessive monitoring or withholding information, not providing appropriate support to complete tasks, resulting in failed deadlines, tasks and objectives;
- **physical or verbal assault**, such as shouting; and

- **micro-aggressions**, which are indirect, subtle or unintentional discrimination against members of a marginalised group.
- **cyber-bullying** includes abusive social networking, trolling, or sending emails with threatening or inappropriate content.

It is essential to remember that it is not the intention of the perpetrator that decides whether bullying or harassment has taken place; instead, it depends on whether the behaviour is unacceptable by reasonable normal standards and is harmful or unwelcome to the person or people on the receiving end.

Victimisation

ACAS defines victimisation as treating someone unfairly because of making or supporting a complaint to do with a protected characteristic, or the perception you have made a complaint.

Inappropriate Behaviour

Although it may not amount to bullying and harassment, the Charity will not tolerate behaviour which is offensive or insulting for the recipient.

Examples of inappropriate behaviour can include:

- offensive comments, language, remarks or jokes;
- displaying offensive or suggestive literature or remarks; and
- wearing clothing (such as a T-shirt) with an offensive motif.

Responsibilities of senior colleagues

All senior colleagues employed by the charity have an enhanced duty to take action to prevent harm. They must be fully aware of their responsibilities, act accordingly and be accountable for their actions.

Colleagues with seniority in the charity, whether from age, experience, connections, role or length of service, must not use that seniority to take advantage of colleagues, partners or guests, some of whom may be junior or less experienced.

Senior colleagues must be aware of power dynamics that may be an exacerbating factor in, for example, bullying, racism or sexual harassment.

Senior colleagues have enhanced responsibilities to behave appropriately in the workplace or at events, and hence also the possibility of enhanced sanctions for inappropriate behaviour.

Senior colleague have an enhanced responsibility to report close relationships with colleagues and junior colleagues, irrespective od the nature (family, friendship, romantic, connected business) to the Head of HR, to ensure that appropriate steps can be taken to ensure impartiality, favoritism, fairness, victimisation, due diligence and a conflict of interest are assessed, with appropriate steps taken to actively prevent harm to the Charity and employees.

Preventative Action and Support

The Charity has implemented measures to prevent sexual and other forms of harassment, bullying, discrimination, victimisation and inappropriate behaviour:

Zero Tolerance Policy: The Charity maintains a zero-tolerance stance towards sexual and other forms of harassment, bullying, discrimination, victimisation and inappropriate behaviour.

This policy clearly defines these types of behaviour, outlines reporting procedures, and emphasises the Charity's unwavering commitment to preventing and addressing all instances. This zero-tolerance policy also applies to inappropriate behaviour of our third parties, guests, volunteers and contractors and will continue to support our employees to apply a zero tolerance approach.

Training and Awareness: Training sessions will be made available for all employees to educate them on what constitutes sexual and other forms of harassment, bullying, discrimination, victimisation and inappropriate behaviour, how to identify it, and the appropriate steps to take if they witness or experience it. Training will also cover bystander intervention and promoting a culture of respect in the workplace.

Speaking Up: The Charity encourages open communication where employees feel safe to report incidents of harassment without fear of reprisal. Employees are urged to speak up if they observe inappropriate behaviour and are assured that their concerns will be taken seriously and addressed promptly.

Reporting: If employees wish to raise a formal dignity at work complaint, either in relation to themselves or something they witness, they should do so in writing and forward to the Head of HR in the first instance, either via email. The Charity has also made an online form available for reporting incidences of sexual harassment on the internet and intranet. If this is not possible or appropriate, employees can talk to someone else about it such as another manager, or a Trade Union representative.

Regular Assessments: As part of our general risk assessment process, risk assessments (including for business travel) and staff surveys will be conducted to evaluate risks in the workplace, including the risk of sexual harassment, and identify any potential areas of concern. The findings will be used to address risk factors and implement targeted interventions.

Charity procurement processes will ensure suppliers are aware of the Charity's zero tolerance approach to sexual and other forms of harassment, bullying, discrimination, victimisation and inappropriate behaviour.

Leadership Responsibilities: All managers are expected to lead by example by demonstrating respectful behaviour, adhering to anti-harassment policies, and actively supporting initiatives to prevent all forms of harassment. Leaders will create a safe and inclusive work environment for all employees, taking appropriate action if inappropriate behaviour occurs.

In the most serious or criminal cases this could include reporting to the police and/or (following due process) summary dismissal for gross misconduct.

Support and Resources

Support resources, such as counselling services via the employee assistance programme are available to employees who have experienced harassment. Support for employees is always available through the employee assistance programme on **0800 028 0199**.

If you feel that you need of urgent and immediate support, please contact the relevant authorities, your GP or call 999 in an emergency. Further support is also available from Rape Crisis England and Wales, Crimes Stoppers, or Victim Support.

Support is also available via

Raising a complaint

Everyone has the right to complain if they consider they are being harassed, sexually harassed, bullied, or victimised, or experience any behaviour that compromises their dignity at work.

In addition, the Charity recognises the critical role that witnesses play in addressing inappropriate behaviour and witnesses are encouraged to report any incidents they observe.

Anyone making a complaint can be assured that they will be protected from any victimisation that could arise as a result of making a complaint.

Any individual who is found to have threatened or retaliated against a complainant or witness in any way may be subject to disciplinary action. If anyone believes that they have suffered any such treatment, they should inform the Head of HR immediately.

Any complaints made under this policy will be treated in a sensitive manner. Concerns will be treated seriously, and actions taken in line with the Charity's relevant Policies and Procedures.

If asked to treat the matter in confidence we will do our upmost to respect the request as far as possible, restricting it to a 'need to know basis'.

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