Dignity at Work Policy. January 2025

At Blurred, we are committed to creating a working environment free of harassment, sexual harassment, intimidation and bullying. We want to create a safe and enjoyable place of work, where everyone is treated with dignity, kindness and respect.

We adopt a zero-tolerance approach to instances of bullying or harassment.

What we expect from you

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying this policy. Whatever your job is, this is part of your role.

Any dealings you have with third parties, including clients, Cohort members, suppliers, contractors, colleagues and consultants, must be free from discrimination, harassment, victimisation or bullying.

If any of our people are found to have committed, authorised or condoned an act of bullying or harassment, we will take action against them (for those to whom it applies) under our Disciplinary procedure, up to and including dismissal.

There is no justifiable reason to bully or harass someone else. Even if you do not intend to bully or harass someone else, this does not legitimise your behaviour as it is the impact on the recipient that is important.

You should be aware that you can be personally liable for harassment.

If you experience bullying or harassment, we encourage you to speak up without delay and to ask for appropriate support via your line manager or our MD, Rachel Minty. You can also go direct to out NED for People and Purpose - <u>nicolablee@icloud.com</u> - or our HR partners, Journey HR -<u>hollyevans@journeyhr.com</u>

Who does the policy apply to?

This policy covers bullying and harassment of and by managers, team members, contractors, agency staff and anyone else engaged to work at Blurred.

It covers any form of bullying and harassment in the workplace and in any work-related settings outside of the workplace such as business trips or work-related social events or online.

The policy also relates to job applicants, and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

What constitutes bullying and harassment

Bullying is offensive, intimidating, malicious or insulting behaviour and/ or abuse or misuse of power that is meant to undermine, humiliate, or injure the other person. It can range from extreme forms such as violence and intimidation to less obvious actions such as deliberately and continuously ignoring someone.

Bullying does not include legitimate and constructive criticism of performance or behaviour, an occasionally raised voice or an argument.

Harassment is unwanted physical, verbal or non-verbal behaviour that is carried out for the purpose of violating a person's dignity or to create an intimidating, hostile, degrading, humiliating or offensive environment. It may include insults, inappropriate jokes, unnecessary contact, threatening behaviour or gossip.

Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. Some employees may not understand that their behaviour is unwelcome or offensive and, in some cases, first-time conduct which unintentionally causes offence may be resolved by explaining to the person how their actions make you feel. However, if this conduct continues after you have made it clear that it is unacceptable, this may constitute harassment.

Harassment also includes circumstances where employees are subjected to unwanted conduct from third parties such as clients, customers, suppliers, vendors, or visitors, and it will not be tolerated under any circumstances. All employees are encouraged to report any instances of third-party harassment, following the same reporting steps as internal harassment complaints. This includes reporting the incident to a manager or HR, with the assurance that all reports will be treated confidentially and investigated promptly. To prevent third-party harassment, the organisation will issue our policies to external parties and establish clear conduct expectations. In response to an incident, appropriate actions will be taken, which may include warning or banning the individual, ceasing work with the business or individual, reporting any criminal behaviour to the police, and sharing information across other branches of the business to prevent further issues. Our commitment to maintaining a harassment-free workplace applies to all sources of harassment, whether internal or external.

Direct discrimination occurs when a person is treated differently as a result of certain protected characteristics:

• Sex



- Gender Reassignment
- Race
- Disability
- Sexual orientation
- Religion or belief
- Age
- Pregnancy
- Marriage and civil partnership

Sexual Harassment

At Blurred, we maintain a zero-tolerance policy towards sexual harassment and are committed to creating a safe and respectful workplace. We have implemented proactive measures to help prevent incidents from occurring. While the following is not an exhaustive list, these examples reflect key initiatives identified in our most recent risk assessment.

- **Risk assessment-** We carry out an annual risk assessment on sexual harassment, this offers a set of targeted questions designed to help identify potential hazards in the workplace, marking the first step in the risk management process.
- **Checks** We carry out reference checks for all workers & employees.
- **Ensure access to leadership** We have an open-door policy for employees to access leadership outside of their direct reporting line.
- **Policy Publicity-** We regularly publicise our "Dignity at Work policy" through onboarding, internal communications, and training sessions to ensure all employees are aware.
- **Training & Bystander Training-** We incorporate anti-sexual harassment & bystander intervention training into our DEI training programme to empower employees to address inappropriate behaviour.
- **Leadership Accountability-** Our managers and senior leaders are responsible for upholding and promoting a respectful work environment. They are trained to identify and address inappropriate behaviour proactively.
- **Clear Reporting Procedures** We make reporting procedures visible and straightforward, ensuring employees know both informal and formal processes, and offer easy access to reporting channels for all staff, including temporary and freelance workers.
- Anonymous Feedback and Engagement surveys- We regularly conduct anonymous surveys to gauge the workplace climate regarding respect and inclusion. These surveys help us proactively identify areas for improvement.
- **Small workforce and confidentiality concerns:** We've acknowledged this as a potential concern, so we've established anonymous reporting channels by using third-party organisations for complaint handling such as JourneyHR / our coach and NED for People & Purpose.

- **Third-Party Interaction:** We provide clear guidelines on appropriate behaviour when interacting with third parties and establish reporting mechanisms for incidents involving contractors or the public.
- **External workforces embedded in your business-** We include external workers in workplace training and policies on this subject, and ensure they have access to the same reporting and support systems. This helps establish clear conduct expectations for external workers.
- **'Working with Blurred'.** Expectations and position outlined in this client partnership document.

Meaning of sexual harassment

Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Examples of sexual harassment

Sexual harassment can occur in many forms. While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (eg by text, video clip, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

What to do if you are being bullied, harassed or sexually harassed?



We understand that not everyone will want to, or be ready to, go down a formal route when reporting an issue. Therefore, we've highlighted some informal options for you.

Addressing the issue directly:

- If you feel able, you can raise the issue with the individual directly.
- Politely make it clear that their behaviour is unwelcome and ask them to stop.
- They may not be aware that their behaviour is offending you.

Seeking support:

- If you don't feel comfortable speaking to the individual directly, consider asking your line manager, our MD, a colleague, or HR for support.
- For 'once removed' support you can also go direct to out NED for People and Purpose - <u>nicolablee@icloud.com</u> – or our HR partners, Journey HR - <u>hollyevans@journeyhr.com</u>
- You can choose whether you want them to speak to the individual on your behalf.
- We will respect your wishes where possible.

How HR can help:

- HR is here to listen and offer a confidential space to discuss your concerns.
- We can coach you on how to approach the situation or provide advice on the next steps.
- HR can facilitate mediation between you and the individual involved to resolve the issue informally.
- We will help you find the right support, whether that's within the organisation or through external resources.
- If needed, HR can also guide you through formal procedures while ensuring your well-being remains a priority.

Serious concerns:

- If your safety or the safety of others is at risk, or if the matter is serious, we may need to approach the individual and initiate a formal investigation.
- Where possible, we will discuss this with you first.



Access to leadership:

- We have an open-door policy for all employees to access leadership outside their direct reporting lines.
- If you feel more comfortable talking to any member of the leadership team instead of your line manager, simply ask for a confidential or informal conversation.
- HR is also available for support in these situations.

Formal route

If you are not satisfied with the outcome of the informal process, or if you feel that handling the issue informally is not appropriate, you may choose to raise it formally.

To begin the formal process, you should first discuss it with your line manager or a member of the HR team.

A formal complaint can be made through the Grievance Procedure. For all relevant information, please refer to **the Grievance Policy / whistle blowing Policy in our employee handbook.**

The HR team will be more than happy to guide you through the process and explain what it involves.

Support for those affected or involved

We understand that being involved in a complaint (informal or formal) of bullying, harassment or sexual harassment can be stressful. We are committed to supporting you throughout the process.

Working arrangements:

• If you find it difficult to continue working closely with the alleged bully/harasser during the investigation, please let us know. We will take any requests to adjust your working arrangements seriously.

Emotional support:

• Free and confidential counselling is available through The Spill platform

Protection from victimisation:

- If you raise a complaint or participate in a bullying or harassment investigation in good faith, you should not face any detrimental treatment or victimisation.
- If you feel you have experienced victimisation, please inform your line manager or HR as soon as possible.

Ongoing working relationships:

- Regardless of the outcome of the complaint, we will carefully consider how to manage the ongoing working relationship between you and the individual involved.
- Depending on the circumstances, we may adjust job duties, location, or reporting lines for either party. Alternatively, workplace mediation or counselling may be appropriate.

Sensitivity and confidentiality

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

If you are found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

Continuous Improvement

We will regularly review and update this policy to ensure it remains in line with best practices and legal requirements. Our commitment to preventing sexual harassment is ongoing, and we will continue to seek new ways to promote a respectful workplace culture.

Zero Tolerance

Any confirmed incidents of sexual harassment will be met with disciplinary action, up to and including dismissal, depending on the severity of the behaviour.