

Anti-Harassment and Bullying Policy

Policy

Purpose

Celerity Limited (herein after referred to as ‘Celerity’ or “the company”) is committed to providing a safe, respectful, and inclusive working environment for all staff, contractors, and visitors. We believe everyone deserves to be treated with dignity and respect, regardless of background or personal characteristics. Bullying and harassment will not be tolerated under any circumstances.

Scope

This policy applies to all employees, agency staff, contractors, consultants, and third parties (including clients, suppliers, and visitors) whether working on company premises, remotely, or attending work-related events and social functions.

Protected Characteristics

Celerity is committed to upholding the principles of equality and diversity. We do not tolerate discrimination or harassment based on any protected characteristic, as defined by the Equality Act 2010:

- Age
- Sex
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sexual Orientation

Definitions

Harassment

Harassment is any unwanted physical, verbal, or non-verbal conduct which has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. This includes, but is not limited to, offensive jokes, unwanted sexual advances, or conduct directed at an individual for reasons unrelated to protected characteristics (e.g., weight, appearance). Harassment also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past. A single incident can amount to harassment. The effect on the recipient is what matters, not the intention of the perpetrator.

Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour involving the misuse of power, which can leave an employee feeling vulnerable, upset, humiliated, undermined, or threatened. Power may arise from position, strength, or the ability to coerce through fear or intimidation.

Examples of Unacceptable Behaviour

Unacceptable behaviour includes, but is not limited to:

- Spreading malicious rumours or insulting someone
- Ridiculing, demeaning, or excluding others
- Unfair treatment or excessive supervision
- Unwelcome sexual advances or comments
- Threats about job security without foundation
- Deliberately undermining a competent worker
- Blocking promotion or training opportunities
- Physical contact ranging from touching to assault
- Offensive jokes or gestures
- Displaying offensive material

Responsibilities

- **Managers:** Responsible for promoting a respectful and safe working environment, ensuring staff understand and follow this policy, and responding promptly and appropriately to any concerns. Managers should lead by example; support affected individuals and escalate issues to HR when necessary.
- **All Staff:** Are encouraged to report any incidents they witness and to support colleagues who may be affected. Creating a respectful and safe workplace is a shared responsibility.
- **HR, People & Compliance Director:** Responsible for managing investigations into bullying and harassment, ensuring they are handled fairly, confidentially, and in line with legal and policy standards. Also oversees compliance with this policy, monitors outcomes, and ensures staff training and support are in place.

Reporting and Complaints

Informal Resolution

Where possible, concerns should be raised informally with the individual responsible or with a line manager. Sometimes, the person may be unaware their behaviour is causing offence and may welcome the opportunity to correct it. Employees are encouraged to keep notes of any conversations.

Formal Complaints

If informal resolution is not possible or appropriate, employees may raise a formal complaint in writing with their line manager or directly with the HR, People & Compliance Director. Complaints should include full details of the unwanted conduct, dates, times, locations, and names of any witnesses. If the complaint concerns the HR, People & Compliance Director, it should be referred to the Chief Executive Officer (CEO).

All complaints will be treated with strict confidence.

Investigation and Action

Celerity will investigate all complaints of bullying and harassment promptly, thoroughly, impartially, and objectively.

Investigations will be completed without unreasonable delay, typically within 14–21 days of the initial complaint, in line with ACAS guidance, unless exceptional circumstances apply.

If the complaint involves a third party, the company will attempt to address the matter with the third party as appropriate.

At the conclusion of the investigation, the findings will be reviewed by a Board member, and a further meeting will be scheduled with the complainant to discuss the outcome and any proposed action.

Appeals

If a complainant is dissatisfied with the outcome of an investigation, they may appeal in writing to a director within 7 days. An appeal meeting will be scheduled within 7 days, and the appeal will be heard by an impartial manager.

The decision will be confirmed in writing within 7 days of the appeal hearing, after which there is no further right of appeal.

Confidentiality

Details of investigations, the names of those involved, and the outcome will remain confidential unless disclosure is absolutely necessary. Information about complaints and outcomes may be held on the employee's file.

Data Protection

All personal data collected during the investigation process will be handled in accordance with the UK GDPR and the Data Protection Act 2018. Access will be restricted to those with a legitimate need to know, and data will be retained only as long as necessary for the purposes of the investigation and any resulting actions.

Third Party Harassment

Harassment or bullying by or towards third parties (clients, suppliers, visitors) will not be tolerated. Complaints will be investigated and appropriate action taken, which may include banning individuals from premises or terminating contracts.

Protection Against Retaliation

Victims, witnesses, and those participating in investigations will be protected from retaliation or victimisation. Any employee found to have retaliated or victimised another will be subject to disciplinary action.

False Allegations

Any employee who deliberately provides false information or acts in bad faith as part of the investigation process will be subject to disciplinary action.

Monitoring and Review

The HR department will monitor complaints and outcomes, provide training to all staff on recognising and preventing bullying and harassment, and review this policy regularly to ensure effectiveness and legal compliance.

All investigations and disciplinary procedures will follow the ACAS Code of Practice on Disciplinary and Grievance Procedures to ensure fairness and legal compliance.



Support

Celerity offers confidential counselling and support to anyone affected by bullying or harassment, including both complainants and those accused. All parties involved will be treated with dignity and offered appropriate support throughout the process .

Further Information

For full details, please refer to the Anti-Bullying and Harassment Policy in the Employee Handbook or on the company Intranet. This policy is available in accessible formats upon request, including large print and screen-reader compatible versions, to ensure it is inclusive and usable by all employees. If you require assistance accessing or understanding this policy, please contact the HR, People & Compliance team .

Signed, (on behalf of the HR, People & Compliance Director)

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Date of last review/update 27/10/2025	Version Number 04
Information Classification Internal	