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| Authorised sign-off | BMS EDT                               |



# Bullying, Harassment and Sexual Harassment policy

## 1. Introduction

At BMS World Mission, we are committed to creating and maintaining a working environment where every individual feels valued, respected, and safe. Bullying, harassment, and sexual harassment are entirely unacceptable, and we operate a zero-tolerance approach to such behaviours, recognising their harmful impact on individuals and the workplace culture.

This policy ensures that employees, contractors, and temporary workers are protected from behaviours that undermine their dignity or safety. It is closely aligned with BMS's [Safeguarding Policy](#), particularly where safeguarding concerns arise, such as harassment involving a vulnerable adult or child.

The policy complies with UK statutory requirements, including the Equality Act 2010, as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023, and follows guidance provided by ACAS (Advisory, Conciliation and Arbitration Service). Its purpose is to uphold dignity and respect in the workplace, fostering a safe, inclusive, and supportive environment for all.

## 2. Scope of the Policy

This policy applies to all employees, contractors, volunteers and temporary workers at BMS (collectively known as staff in this policy) and focuses on workplace behaviour. Specifically, it covers:

- **Inappropriate workplace behaviour:** Bullying, harassment, or sexual harassment occurring in the workplace or during work-related activities, such as meetings, training sessions, or social events.
- **Interpersonal conduct:** Unacceptable behaviours between colleagues, managers, or anyone representing BMS.
- **Third-party harassment:** Bullying, harassment, or sexual harassment perpetrated by external parties (e.g., clients, suppliers, or stakeholders) that impacts the safety or wellbeing of staff.

Any concerns that involve safeguarding issues—such as harassment or abuse directed toward a child, adult at risk, or beneficiary—will be escalated and managed in line with safeguarding procedures. In such cases, People and Culture leadership will work closely with the Safeguarding Team to ensure appropriate action is taken, including reporting to relevant authorities where required.

## 1. General Principles

- At BMS, we are committed to fostering a workplace culture of **dignity, respect, and inclusion**, where all individuals can work free from bullying, harassment, or sexual

harassment—whether in person or online. These principles underpin our approach to creating a safe and supportive working environment:

- **Shared responsibility:** Every individual at BMS, regardless of their role, has a responsibility to contribute to a respectful and inclusive workplace. This includes recognising and addressing inappropriate behaviour, speaking up if they witness or experience misconduct, and upholding BMS’s values of integrity and mutual respect.
- **Zero tolerance:** Bullying, harassment, and sexual harassment are strictly prohibited at BMS. All allegations will be treated seriously, and formal processes, including disciplinary action up to and including dismissal, will be applied where necessary.
- **Legal compliance:** This policy aligns with key UK legislation, including:
  - Equality Act 2010 (and Worker Protection Amendment 2023): Ensuring protection from discrimination and harassment.
  - Protection from Harassment Act 1997: Addressing repeated or severe harassment.
  - Employment Rights Act 1996: Safeguarding employees' rights to a fair and safe workplace.
  - Health and Safety at Work Act 1974: Maintaining a safe working environment.
- **Accessibility and inclusivity:** This policy is written in clear, simple language to ensure accessibility. While it is a UK-specific policy aligned with ACAS guidance and UK legal frameworks, its values and principles can be adapted in other contexts. Cultural sensitivities will be respected, but behaviours causing harm or discomfort—whether in-person or online—will not be excused.
- **Values-based approach:** This policy reflects BMS’s core values of fairness, integrity, and safeguarding the well-being of employees. These principles guide how BMS responds to incidents, ensuring all actions align with the organisation’s ethos.
- **Prompt and supportive action:** All concerns will be addressed promptly, fairly, and with sensitivity. Individuals involved — whether as complainants, respondents, or witnesses — will receive appropriate guidance and support throughout the process.
- **No retaliation:** BMS has a zero-tolerance policy for retaliation or victimisation against anyone who raises a concern in good faith. Such behaviours will be treated as serious misconduct.
- **Accountability and reporting:** Clear reporting frameworks ensure that all concerns are appropriately addressed. A process summary is provided in the Bullying and Harassment policy guidance document to clarify reporting pathways..
- **Potential criminal conduct:** Certain behaviours, such as sexual assault, stalking, or harassment, may constitute criminal offences under UK law. In these cases, BMS will involve the appropriate authorities while continuing to support affected individuals.

## 2. Definitions and Expectations

At BMS World Mission, all staff are responsible for their behaviour in the workplace and in any setting where they represent BMS, including work-related events and travel. We expect everyone to act with respect and consideration for others, recognising and valuing individual differences.

As a polycentric and global organisation, we interact across diverse cultures. While we encourage sensitivity to cross-cultural behaviours and values, no one should feel compelled to tolerate behaviour that makes them feel uncomfortable. Staff are encouraged to speak up about any inappropriate conduct, regardless of context.

## 2.1 What is Bullying?

Bullying is behaviour that is offensive, intimidating, malicious, or insulting. It often involves an abuse or misuse of power and can undermine, humiliate, or cause harm to another person.

Bullying can take many forms, including:

- This includes direct confrontations such as verbal abuse, or indirect actions, such as excluding someone from group activities or conversations.
- Behaviours can range from overtly threatening actions to subtle, passive-aggressive behaviours, such as deliberately ignoring or sidelining someone.
- Public actions, such as humiliating remarks in meetings, or private actions, such as spreading false rumours about a colleague.
- Bullying can occur in face-to-face settings or through online platforms, emails, texts, or private messaging. For further clarity on online conduct, refer to the Social Media Policy.
- A single, serious incident may be considered bullying if it has a significant impact, though bullying often involves repeated actions.

Examples of workplace bullying include:

- Assigning tasks that are unachievable, workloads that are unmanageable, or deadlines that are impossible to meet.
- Singling someone out for unpleasant or trivial jobs.
- Withholding critical information, providing misleading instructions, or deliberately excluding someone from communications, virtual meetings or online team discussions without justification.
- Making inappropriate comments or threats about job security.
- Using online tools, social media platforms or private messages to isolate, demean, or intimidate others.
- Using work-related platforms to engage in passive-aggressive or inappropriate behaviour, including “cyber-silent treatment” (e.g., deliberately ignoring someone’s contributions in an online setting).

Bullying, whether intentional or not, can have a profound impact on individuals and workplace culture. Managers and colleagues have a responsibility to recognise and address such behaviour.

## 2.2 What is Harassment?

Harassment is unwanted conduct related to a protected characteristic that violates someone’s dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Protected characteristics under the Equality Act 2010 include:

- Age
- Pregnancy and maternity
- Disability
- Race, ethnic, or national origin
- Sex
- Marriage and civil partnership
- Sexual orientation
- Gender reassignment
- Religion or belief

Harassment can occur in various forms, including verbal, non-verbal, physical, or digital behaviours. These actions may be intentional or unintentional, but if they create a hostile, intimidating, or offensive environment, they constitute harassment. For example, if someone makes assumptions or makes derogatory remarks about a person because a family member has a disability or has changed gender.

- Making derogatory remarks, offensive jokes, or mocking someone's protected characteristic (e.g., age, sex, disability, race).
- Sharing or displaying explicit or inappropriate images or videos, whether in person, via email, or online platforms.
- Deliberately excluding someone from work-related activities, communications, or decisions due to their protected characteristic.
- Penalising someone or treating them unfairly because they rejected or complied with unwanted behaviours (e.g., sexual advances).
- Sending offensive, inappropriate, or threatening messages through work emails, private messaging apps, or other digital communication platforms.
- Sharing false or damaging rumours or disclosing personal or sensitive information about an individual through digital or in-person channels.

These behaviours are serious and will be addressed under BMS's disciplinary procedures.

**Victimisation** is also considered harassment and occurs when someone is treated unfairly because they:

- Raised a complaint about discrimination or harassment.
- Supported someone else in raising a complaint.
- Participated in an investigation or legal claim related to harassment or discrimination.

Harassment does not require intent to offend. Even if behaviour was not intended to cause harm, it can still constitute harassment if it is unwanted and negatively impacts the recipient. Behaviour does not need to be directed at you to affect you—for example, overhearing offensive comments or jokes.

## 2.3 What is Sexual Harassment?

Sexual harassment is unwanted behaviour of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Key points about sexual harassment:

- It can occur between individuals of any gender.
- The perpetrator's intent is irrelevant; the focus is on the impact on the recipient.
- A single incident can constitute sexual harassment if it is sufficiently serious.
- It includes treating someone unfairly because they rejected or complied with unwanted sexual behaviour.

Examples of sexual harassment include:

- Touching, hugging, or making advances without consent.
- Making lewd remarks about someone's appearance, body, or clothing.
- Pressuring someone for sexual favours or repeatedly asking someone out after refusal.
- Sending or displaying sexual images, videos, or jokes, in person or online.
- Staring, leering, or making suggestive gestures.
- Sharing false or inappropriate rumours about someone's sexual relationships.

## 2.4 Prevention of Sexual Harassment

BMS is committed to taking reasonable steps to prevent sexual harassment in the workplace. This includes:

- **Clear policies:** Communicating this policy to all employees, contractors, and stakeholders to ensure everyone understands their rights and responsibilities.
- **Training:** Providing regular training for employees and managers on recognising, preventing, and addressing sexual harassment.
- **Reporting mechanisms:** Establishing accessible, confidential, and well-publicised channels for reporting concerns, including internal and external options where appropriate.
- **Risk assessments:** Conducting regular assessments of workplace environments to identify and mitigate potential risks of harassment, including third-party harassment by clients, suppliers, or other external parties.

## 2.5 Unacceptable Behaviour

BMS considers the following behaviours unacceptable in any context:

- Threatening or using physical violence.
- Using insulting, humiliating, or offensive language, whether spoken or written.
- Sending or displaying offensive words or images, including on posters, graffiti, tattoos, or online platforms.
- Abusing a position of power or authority.

- Making sarcastic or snide remarks, inappropriate jokes, or “banter” that causes discomfort.
- Spreading rumours or gossip to harm someone’s reputation.
- Excluding someone from meetings, communications, or activities.
- Making unwelcome sexual advances or comments.
- Engaging in unnecessary or unwanted physical contact.
- Behaving in a way that undermines or belittles someone’s contributions.

## 2.6 Behaviour Outside the Workplace

This policy also covers behaviour outside the physical workplace, provided it is related to work. Examples include:

- Work-related social events or activities.
- Training sessions or conferences.
- Work-related travel or interactions with external parties.

If you experience inappropriate behaviour outside the workplace, report it to your manager or another appropriate person. Such behaviour will be investigated and addressed under this policy.

## 2.7 Social Media

Social media is an integral part of modern communication, but inappropriate behaviour on these platforms can have serious consequences for individuals and the workplace environment. All staff are expected to adhere to BMS’s values and maintain professional standards when engaging on social media, whether in a personal or work-related capacity. Examples of inappropriate behaviour include:

- **Posting offensive content:** Sharing offensive, disrespectful, or inappropriate comments, images, or videos about colleagues or the organisation.
- **Spreading harmful information:** Disseminating rumours, false information, or personal details about others that could harm their reputation or privacy.
- **Misusing work-related platforms:** Using BMS platforms or work-related accounts to engage in inappropriate or unprofessional communication.

Such behaviour is a breach of workplace standards and will be treated seriously. Depending on the severity, it may result in disciplinary action, up to and including dismissal.

This section complements the [Social Media Policy](#), which provides detailed guidance on acceptable and unacceptable use of social media in both personal and professional contexts. Staff are encouraged to familiarise themselves with this policy to ensure compliance with organisational standards and expectations. In all cases, behaviour on social media—whether public or private—that undermines the dignity, respect, or safety of others will not be tolerated. If you witness or experience inappropriate social media behaviour, you are encouraged to report it through the appropriate channels, as outlined in this policy.

## 2.8 Performance Management

Bullying should not be confused with managing someone's performance. A performance management process is a legitimate and structured approach to addressing workplace issues and supporting professional growth.

If you are undergoing a performance management process, it should:

- Be clearly explained to you, including the reasons for it and the expectations for improvement.
- Focus on your development and improvement, conducted in a professional and supportive manner.

If you feel that your manager's behaviour is unacceptable during a performance management process, you are encouraged to:

- Discuss your concerns directly with your manager if you feel comfortable.
- If unresolved or inappropriate, consider raising the issue formally in line with the procedures outlined in this policy.

By distinguishing between performance management and bullying, we ensure that legitimate feedback and processes are conducted fairly, without creating a hostile or harmful environment.

## 3. Reporting Concerns

### 3.1 If you witness bullying, harassment, sexual harassment

If you witness behaviour that you believe constitutes bullying, harassment, or sexual harassment, please report it to your manager, Safeguarding Lead or safeguarding team member, or a member of People and Culture. Reports will be taken seriously and handled confidentially.

### 3.2 If you experience Bullying, Harassment or Sexual Harassment by a colleague

#### *Informal Approach*

We recognise that raising concerns about bullying, harassment, or sexual harassment can feel challenging. It can be helpful to talk through your concerns with someone you trust. This could be your line manager, department director, safeguarding lead, or a member of the People and Culture team.

If you feel able, an informal resolution can often be an effective first step. Explaining to the person how their behaviour has affected you and asking them to stop may resolve the issue. They may not realise the impact of their actions. If you do not feel comfortable speaking directly to the individual, your manager or another trusted person can have a confidential conversation with them on your behalf. This conversation will focus on raising awareness of their behaviour and encouraging positive change without formalising the situation.

If your concern involves your line manager, or if you feel unable to raise the issue with them, you can approach their manager, another senior leader, or a member of the safeguarding or People and Culture teams.

Whether concerns are raised formally or informally, the safeguarding procedures should be considered and appropriate action taken.

If informal efforts to address the issue have not resolved the problem, or if you feel the behaviour

is too serious to handle informally, you can raise a formal complaint.

### ***Raising a Formal Complaint***

Formal complaints should be submitted under the Grievance Policy, made in writing and include the following details:

- A clear description of the behaviour or incident(s) causing concern.
- The name(s) of the person(s) involved.
- The dates, times, and locations of the incident(s), where possible.
- Any witnesses or evidence to support your complaint.

You should submit your complaint to your line manager, unless the complaint involves your line manager, in which case you should escalate it to their manager.

If the complaint concerns a member of the Executive Director Team (EDT), it should be directed to the General Director and a member of HR. Complaints involving the General Director should be submitted to the Chair of the Board of Trustees.

Please see the Grievance Policy for more information. Formal complaints can also be submitted under the BMS Whistleblowing Policy.

### **3.3 Safeguarding and Bullying, Harassment or Sexual Harassment Complaints**

The Bullying, Harassment, and Sexual Harassment Policy and the [Safeguarding Policy](#) are complementary policies that work together to address and respond to inappropriate behaviours in the workplace, ensuring a safe and respectful environment for all. Where instances of bullying, harassment, or sexual harassment intersect with safeguarding concerns—such as the involvement of an adult at risk or child—these policies operate in tandem to ensure that complaints are handled appropriately and in line with legal and organisational standards.

Allegations involving safeguarding, bullying, or harassment will be handled by the Safeguarding Lead and People and Culture team to ensure a thorough and appropriate response. An incident which may impact the safety and wellbeing of an individual may be managed within the context of another policy e.g. disciplinary and bullying and harassment, and this decision will be recorded with any safeguarding report that has been created, along with any safeguarding actions taken.

Concerns such as harassment or abuse directed toward a child, adult at risk, or beneficiary will always be managed in line with safeguarding procedures.

- If a reported incident involves behaviours that may constitute a safeguarding concern (e.g., harassment of an adult at risk or child, or any action that may place an individual at risk of harm), it will be assessed under both this policy and the Safeguarding Policy.
- Any incident involving safeguarding concerns will be referred immediately to the Safeguarding Lead for further action.
- Complaints will first be assessed to determine whether they are primarily workplace-related (e.g., interpersonal issues, bullying, harassment) or safeguarding-related (e.g., harm or risk to a vulnerable adult or child). This ensures the appropriate policy framework is applied.
- If a complaint falls under both policies, a coordinated approach will be taken, involving People and Culture leadership and the Safeguarding Team.

- For workplace-related concerns: Managed through this policy, with People and Culture taking the lead. Complaints may result in disciplinary action, mediation, or other appropriate responses.
- For safeguarding-related concerns: Managed through the Safeguarding Policy, following established safeguarding reporting procedures. If appropriate, external authorities or statutory bodies will be contacted (e.g., police or social services).
- The process BMS follows for when and how concerns are escalated to external authorities or statutory agencies, is available in the [Grievance Policy](#) and Grievance policy guidance.
- Points of integration between the two policies.
- People and Culture and the Safeguarding Team will work closely to ensure:
  - A consistent approach to addressing complaints.
  - All relevant parties are informed of the process and supported appropriately.
  - The organisation's response aligns with both safeguarding principles and workplace fairness.
- All complaints, whether workplace-related or safeguarding-related, will be handled with the utmost confidentiality. Information will be shared only with those who need to know in order to address the complaint effectively and in line with organisational policies and legal requirements.
- Staff will be trained on the overlap between these policies, including:
  - Recognising safeguarding concerns in the context of bullying, harassment, or sexual harassment.
  - Knowing how and when to escalate concerns under the Safeguarding Policy.
  - Understanding their responsibilities to create a safe and respectful workplace.
- By aligning the Bullying, Harassment, and Sexual Harassment Policy with the Safeguarding Policy, BMS ensures a comprehensive approach to handling complaints that protects individuals from harm while addressing inappropriate behaviours in the workplace. This integration reinforces BMS's commitment to dignity, respect, and safeguarding for all.

### **3.4 If the perpetrator is not a colleague**

If you experience bullying, harassment, or sexual harassment from an external party (e.g., a client, supplier, or stakeholder), report the incident to your line manager or a member of People and Culture. BMS will take steps to address the situation and support you.

## **4. Investigation and Resolution**

### **4.1 Investigation Process**

We are committed to managing the investigation process in a way that is thorough, respectful, and supportive. Our goal is to resolve the matter fairly, while maintaining sensitivity and confidentiality for all involved. Once a formal complaint is received, it will be handled in a fair, sensitive, and confidential manner. When an investigation takes place:

- All parties involved will have the opportunity to provide their account of events.

- The investigation may involve reviewing evidence, speaking to witnesses, and assessing relevant documents.
- Temporary adjustments, such as changes in reporting lines or working arrangements, may be implemented during the investigation to ensure the comfort and safety of all involved.

#### 4.2 Outcome and next steps

At the conclusion of the investigation:

- The findings will be communicated to you and, where appropriate, to the individual(s) involved.
- If the complaint is upheld, appropriate action will be taken, which could include disciplinary measures, up to and including dismissal.
- If the complaint is not upheld, we will work with you to ensure the reasons for this decision are explained and that you feel supported.

#### 4.3 Right to Appeal

If you are not satisfied with the outcome of your complaint, you have the right to appeal.

- Appeals must be submitted in writing within five working days of receiving the outcome, outlining why you disagree with the decision.
- A senior manager not previously involved in the investigation will review the appeal.
- You will be invited to discuss your appeal, and the final decision will be communicated to you in writing.

We are committed to ensuring the appeal process is fair, transparent, and handled with the same sensitivity and confidentiality as the initial investigation.

### 5. Support for all staff

BMS recognises that raising concerns about bullying, harassment, or sexual harassment can be challenging. We are committed to supporting staff by:

- Offering confidential advice and guidance through the People and Culture team.
- Ensuring staff feel safe and respected throughout the reporting and investigation process.
- Protecting individuals from retaliation or victimisation for reporting concerns in good faith.
- Wellbeing support which includes [ the opportunity to talk confidentially with a member of the Safeguarding and Wellbeing team or access to counselling sessions]

### 6. Associated Policies

This policy should be read in conjunction with the following related policies, which provide additional guidance and support for employees:

- [Safeguarding Policy](#): Outlines procedures for protecting individuals from harm, including children and vulnerable individuals we serve.
- [Grievance Policy](#): Explains how employees can formally raise concerns or complaints about workplace issues, including bullying, harassment, and sexual harassment.

- [Disciplinary Policy](#): Details the processes and potential outcomes for addressing inappropriate behaviour.
- [Whistleblowing Policy](#): Provides guidance for reporting serious concerns confidentially.
- [Serious Incident Policy](#): Addresses the management of significant events that may harm individuals or the organisation.

People and Culture Team

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