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## 1. OBJECTIVE

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Lodge Service is committed to fostering a safe, respectful, and inclusive working environment where all employees are treated with dignity. We do not tolerate bullying, discrimination, or harassment in any form.

This policy aims to:

- Define what constitutes bullying, discrimination, and harassment.
- Explain how employees can report concerns.
- Outline how we will handle reports.
- Clarify the actions we may take if the policy is breached.

## 2. SCOPE

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This policy applies to all employees, including part-time, fixed-term, and zero-hours staff. It covers conduct:

- On Lodge Service premises.
- While using company IT systems.
- In any setting where an employee is identifiable as part of Lodge Service.

It applies to both in-person and online behaviour.

We also hold third parties (e.g. clients, contractors, suppliers) to the same standards. Inappropriate behaviour by third parties will be addressed, and from October 2026, Lodge Service may be legally liable for harassment by third parties, even if it is a first-time incident.

Employees should be aware that they may be personally liable for unlawful harassment, which can also constitute a criminal offence.

## 3. ROLE & RESPONSIBILITIES

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We all share responsibility for maintaining a respectful workplace. Everyone is expected to challenge or report inappropriate behaviour when they see it.

You are accountable for your conduct at work, during work-related events, and when representing Lodge Service externally.

If we find that you've bullied, harassed or discriminated against someone, or treated a colleague badly because they've raised a legitimate concern, we regard this as potential gross misconduct and you may be dismissed under the Disciplinary Policy.

If we find that you've made false allegations, we regard this as potential gross misconduct and you may be dismissed under the Disciplinary Policy.

### 3.1 SENIOR MANAGERS & HR

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Senior managers and HR are responsible for:

- Ensuring this policy is included in staff inductions.
- Regularly communicating the policy to all employees.
- Promoting a zero-tolerance culture.
- Providing regular training and conducting risk assessments to prevent harassment.

### 3.2 LINE MANAGER

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Line managers must:

- Encourage open communication and reporting of concerns.
- Foster a safe and inclusive environment.
- Know how to respond to reports of bullying, discrimination, or harassment.
- Understand when to escalate matters to HR or the police.
- Be aware that failure to act on concerns may result in personal liability or disciplinary action.

### 3.3 ALL EMPLOYEES

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All employees are expected to:

- Take responsibility for their behaviour.
- Treat others with respect and uphold company values.
- Report any bullying, harassment, or abusive conduct they experience or witness.

## 4. BULLYING

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### What is bullying?

Bullying is unwanted behaviour from an individual or group that is:

- Offensive, disrespectful, humiliating, intimidating, malicious, or insulting.
- An abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm.

Bullying may:

- Be a one-off incident or a repeated pattern.
- Occur face-to-face, via email, phone, social media, or messaging apps.
- Happen at work or in work-related settings.
- Be subtle and not always visible to others.

### Examples of bullying include:

- Spreading malicious rumours.
- Assigning unfair workloads.
- Publicly belittling or undermining someone.
- Withholding or deliberately misplacing important information.
- Excluding someone from team activities or communications.
- Posting offensive or threatening content about a colleague online.
- Undermining authority, even from someone at the same or junior level.

### Upward bullying

This occurs when a more junior employee or group targets a manager or senior colleague. Examples include:

- Persistent disrespect or insubordination.
- Refusing to complete tasks.
- Spreading rumours to damage credibility.
- Deliberately sabotaging work or reputation.

Being in a senior role does not make someone immune to bullying. All allegations will be taken seriously.

**What bullying is not:**

- Being held accountable for your performance.
- Receiving constructive feedback.
- Having a difference of opinion or conflict handled professionally.

Managing performance fairly and supportively does not constitute bullying. However, if you feel your manager's behaviour is inappropriate, you are encouraged to raise your concerns—either directly or through the formal process outlined in this policy.

## 5. HARASSMENT

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### What is harassment?

Harassment is unwanted behaviour that is related to a **protected characteristic** under the Equality Act 2010. It becomes unlawful when it:

- Violates someone's dignity, or
  - Creates an intimidating, hostile, degrading, humiliating, or offensive environment.
- Protected characteristics include:
- Age
  - Disability
  - Gender reassignment (including trans and non-binary identities)
  - Marriage or civil partnership
  - Pregnancy or maternity
  - Race (including ethnic or national origin)
  - Religion or belief
  - Sex
  - Sexual orientation
  - Political opinion (in Northern Ireland)
  - Socio-economic status

Harassment can also include **sexual harassment**, or treating someone unfairly because they rejected or accepted sexual advances.

Even if the behaviour wasn't intended to offend, it may still be considered harassment if it causes harm or distress. The behaviour doesn't need to be directed at a specific person—if it creates a hostile environment for anyone, it may still be unlawful.

**Examples of harassment include:**

- Sexually suggestive jokes, comments, gestures, or whistling.
- Unwanted physical contact.
- Suggesting that sexual favours could influence career progression.
- Offensive remarks about someone's race, religion, or nationality.
- Outing someone as trans or non-binary without their consent.
- Repeatedly misgendering someone despite being informed of their correct pronouns.
- Ridiculing someone based on stereotypes.
- Spreading rumours about someone's sexual orientation or gender identity.
- Jokes or comments about someone's disability.
- Excluding someone based on their religion or political beliefs.

Harassment may involve:

- A single serious incident.
- Repeated behaviour.
- Verbal, written, visual, or physical actions—including online or digital conduct.

**Note:** Lodge Security recognises that harassment can occur in-person or remotely, including via social media, messaging apps, or other digital platforms.

**Legal context**

Harassment is unlawful under the Equality Act 2010. From **October 2026**, Lodge Security will also be legally required to take **all reasonable steps** to prevent harassment of any kind, not just sexual harassment.

A separate **Sexual Harassment Prevention Policy** is available and should be read alongside this document.

**5.1 STALKING**

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Stalking is a form of harassment and/or bullying which is against the law. Stalking is persistent unwanted conduct which can be physical or psychological.

Examples of stalking behaviours include:

- repeated messages, phone calls or other forms of contact
- following someone
- repeated bullying online

**6. DISCRIMINATION**

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**What is discrimination?**

Discrimination is when someone is treated unfairly or less favourably because of a **protected characteristic**, as defined by the **Equality Act 2010**. Lodge Security does not tolerate any form of discrimination—direct or indirect.

**Protected characteristics include:**

- Age
- Disability

- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Race (including ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

## 6.1 DIRECT DISCRIMINATION

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This occurs when someone is treated less favourably than others because of a protected characteristic.

### Examples:

- A woman is passed over for promotion in favour of a less qualified man.
- A colleague is excluded from social events because their friend is transgender.
- A manager assumes a candidate is Muslim based on their name and excludes them from a role involving alcohol.

## 6.2 INDIRECT DISCRIMINATION

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This happens when a policy or practice applies to everyone but puts people with a protected characteristic at a disadvantage.

### Examples:

- Requiring “native English” speakers for a role, which may disadvantage people from ethnic minorities.
- Asking for UK-based experience only, which may exclude international candidates.
- Setting a minimum height requirement for a job where height is irrelevant.

## 6.3 ASSOCIATE DISCRIMINATION

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This is when someone is treated unfairly because of their association with someone who has a protected characteristic.

### Examples:

- A parent is denied flexible working because they care for a disabled child.
- A single parent is assumed to be unavailable for late shifts.

## 6.4 PERCEPTIVE DISCRIMINATION

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This occurs when someone is treated unfairly because others believe they have a protected characteristic—even if they don’t.

### Examples:

- A candidate is rejected because their name is assumed to be linked to a particular religion.
- An employee is denied promotion because they are wrongly believed to have a disability.
- A woman is not hired because the employer assumes she won’t be able to handle the job.

## 7. VICTIMISATION

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Victimisation occurs when someone is treated unfairly or subjected to negative consequences because they have:

- Made a complaint or raised a concern about discrimination, harassment, or bullying.
- Supported someone else's complaint (e.g. by acting as a witness).
- Intend to make a complaint or are suspected of doing so.

This protection is provided under the **Equality Act 2010**.

### Examples of victimisation include:

- Being ignored, excluded, or treated differently after raising a concern.
- Being denied opportunities (e.g. training, promotion) because you supported a colleague's complaint.
- Facing disciplinary action or threats for speaking up about inappropriate behaviour.

### Lodge Security's commitment:

We will not tolerate any form of victimisation. Employees who retaliate against others for raising or supporting a complaint will face disciplinary action, up to and including dismissal.

If you believe you are being victimised, you are encouraged to report it through the channels outlined in this policy. You will be supported and protected throughout the process.

## 8. WHAT WE MEAN BY ABUSIVE CONDUCT

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Abusive conduct refers to any behaviour that negatively impacts another person in the workplace. It does not need to be deliberate or repeated to be considered unacceptable.

### Abusive conduct may include:

- Harassment
- Discrimination
- Victimisation
- Bullying
- Intimidation
- Microaggressions
- Psychological abuse
- Cyberbullying (including via social media, messaging apps, or email)

This policy uses the term "abusive conduct" to collectively refer to all behaviours that fall under bullying, harassment, discrimination, and victimisation, as well as any other actions that create a hostile or unsafe working environment.

## 9. BEHAVIOUR OF CUSTOMERS OR EXTERNAL PARTIES

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At Lodge Security, we are committed to protecting our employees from inappropriate behaviour—regardless of whether it comes from within the organisation or from external sources.

## 9.1 OUR CLIENTS OR SUBCONTRACTORS

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Employees may experience bullying, harassment, or abusive conduct from third parties such as:

- Customers
- Clients
- Contractors
- Suppliers
- Members of the public

If this occurs, Lodge Security will take appropriate steps to prevent recurrence. These may include:

- Supervising interactions between the employee and the third party.
- Reassigning duties to avoid further contact.
- Reporting the incident to the third party's employer or manager.
- Reporting the incident to the police, where appropriate.

**Legal update:** From **October 2026**, Lodge Security may be **legally liable** for harassment by third parties, even if it is a **first-time incident**. This includes harassment related to any protected characteristic.

All employees are encouraged to report inappropriate behaviour by third parties.

You can:

- Use the **Alert app** to log incidents.
- Speak directly to your **Line Manager** or **HR**.

We are committed to responding promptly and effectively to all reports.

## 10. RAISING CONCERNS & ADDRESSING BULLYING/ABUSIVE CONDUCT

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We understand that raising concerns about bullying, harassment, or discrimination can be difficult. Lodge Security is committed to supporting employees who come forward and ensuring that all concerns are taken seriously and handled sensitively.

### If You Are Affected

If you believe you are being bullied, harassed, or discriminated against, you are encouraged to:

- Speak to your **line manager** or another trusted manager.
- Contact **HR** directly if you do not feel comfortable speaking to your manager.
- Use the **Employee Assistance Programme (EAP)** for confidential support. The 24/7 helpline is available at **0330 380 0648**.

If you witness inappropriate behaviour, don't stay silent. You can:

- Offer support to the person affected.
- Report the behaviour to a manager or HR.
- Use the **Alert app** to log concerns.

We will not tolerate retaliation or victimisation against anyone who raises a concern or supports an investigation.

### Keeping a Record

If you experience or witness abusive conduct, it can be helpful to keep a record of:

- The **date and time** of the incident.
- **What happened** and who was involved.
- **Any witnesses** present.

This information can support informal resolution or formal investigation if needed.

### Options for Addressing Concerns

You may choose to:

- **Speak informally** to the person involved to explain how their behaviour has affected you.
- **Ask your manager** to speak to them on your behalf.
- **Raise a formal complaint** through the grievance procedure if informal steps are not appropriate or unsuccessful.

We encourage informal resolution where possible, as it is often quicker and less stressful. However, we recognise that some situations require formal investigation.

## 10.2. INVESTIGATING ALLEGATIONS & RAISING A FORMAL COMPLAINT

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If informal steps do not resolve the issue—or if the matter is too serious to be handled informally—you can raise a formal complaint.

### How to raise a formal complaint:

- Submit your complaint in writing to **HR**.
- Clearly outline the nature of the concern, including relevant dates, people involved, and any supporting evidence.
- Refer to the **Grievance Policy** for full guidance on the process.

### What happens next:

Lodge Security will carry out a **confidential investigation**, which may include:

- Interviewing the person who raised the concern.
- Speaking with the individual(s) accused of the behaviour.
- Gathering evidence and speaking to any relevant witnesses.
- Considering the context and impact of the behaviour.

We will assess whether the conduct meets the definition of bullying, harassment, or abusive conduct under this policy.

### Outcomes:

If the complaint is upheld, we may take:

- **Disciplinary action** against the individual(s) involved.
- **Further steps** to protect the person affected (e.g. changes to working arrangements).
- **Referral to the police**, if the behaviour may constitute a criminal offence.

Both the person who raised the complaint and the person affected (if different) will be informed of the outcome.

**Support during the process:**

We understand that raising a formal complaint can be stressful. You will have access to:

- **HR support**
- **Confidential counselling** via the Employee Assistance Programme (EAP)
- **Trade union representation** (if applicable)

**10.3. RECORD KEEPING AND DATA PROTECTION**

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Lodge Security is committed to handling all reports of bullying, harassment, and abusive conduct with confidentiality and in accordance with data protection laws.

**What we record:**

We will maintain a secure record of:

- The complaint or concern raised.
- The individuals involved (including the person reporting, the alleged perpetrator, and any witnesses).
- The steps taken during the investigation.
- The outcome and any actions taken.

**Confidentiality:**

Information will only be shared with:

- Individuals directly involved in managing or investigating the concern.
- External authorities (e.g. police) where legally required or appropriate.

We will always consult the person affected before sharing information externally, unless there is a legal obligation to report (e.g. in cases involving:

- Hate crimes
- Physical violence
- Sexual assault)

**Data protection:**

All information will be handled in line with:

- The **Data Protection Act 2018 (DPA)**
- The **UK General Data Protection Regulation (UK GDPR)**

Records will be stored securely and retained only for as long as necessary, in accordance with our data retention policy.

**11. ACTIONS WE CAN TAKE AGAINST AN EMPLOYEE WHO BREACHES OUR POLICY**

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Lodge Security takes all breaches of this policy seriously. If an investigation finds that an employee has engaged in bullying, harassment, discrimination, or any other form of abusive conduct, we will take appropriate action.

**Disciplinary action may include:**

- A formal warning.
- Suspension from duties.
- Dismissal, including summary dismissal for gross misconduct.

**Gross misconduct includes:**

- Serious or repeated bullying or harassment.
- Discrimination based on protected characteristics.
- Victimisation of a colleague for raising or supporting a complaint.
- Any behaviour that creates a hostile or unsafe working environment.

In cases of gross misconduct, dismissal may occur:

- Without prior warning.
- Without notice.
- Without payment in lieu of notice.

**False allegations:**

If an employee is found to have made a false allegation maliciously or in bad faith, this will also be treated as a disciplinary matter and may result in dismissal.

**Criminal conduct:**

Where abusive conduct may also be a criminal offence—such as hate crimes, physical violence, or sexual assault—Lodge Security will report the matter to the police and cooperate fully with any investigation.

## 12. SUPPORT

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Lodge Security is committed to supporting all employees who raise concerns or are affected by bullying, harassment, or discrimination.

**If you raise a concern:**

- You will be treated with respect and taken seriously.
- You will not face negative treatment or retaliation for speaking up in good faith.
- You will be offered support throughout the process, including access to confidential advice and counselling.

**If you are accused:**

- You will be treated fairly and given the opportunity to respond to the allegations.
- If the complaint is found to be unsubstantiated, you will not be penalised or treated differently.
- Support will be available to help you manage the impact of the investigation.

**Confidential support:**

- You can access the **Employee Assistance Programme (EAP)** 24/7 by calling **0330 380 0648**.
- Support is also available via the **PerkPro app**.
- You may also speak to your **line manager**, another manager, or **HR** if you have questions or need guidance.

We recognise that experiencing or witnessing inappropriate behaviour can take a toll on your emotional, physical, and mental wellbeing. You are not alone, and support is always available.

## 13. LEGAL UPDATES AND COMPLIANCE

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Lodge Security is committed to complying with all relevant UK legislation relating to workplace conduct, equality, and employee protection. This section outlines the most recent legal developments and how they are reflected in our policy and practices.

### 13.1 Proactive Duty to Prevent Harassment

From **October 2024**, employers are legally required to take **reasonable steps** to prevent **sexual harassment** in the workplace.

From **October 2026**, this duty expands to cover **all forms of harassment** related to **any protected characteristic** under the Equality Act 2010.

Lodge Security will:

- Conduct regular risk assessments.
- Provide meaningful training to all staff.
- Monitor and review workplace culture and behaviours.

### 13.2 Third-Party Harassment Liability

From **October 2026**, Lodge Security may be held **legally liable** for harassment committed by **third parties** (e.g. clients, customers, contractors), even if it is a **first-time incident**.

We have updated Section 9 to reflect this and will take proactive steps to prevent and respond to third-party misconduct.