

Harassment & Bullying Policy

1. Policy Aims

NHBC is committed to encouraging a culture in which harassment and bullying is unacceptable and where individuals are confident enough to bring complaints of unjust treatment without fear of ridicule or reprisal. NHBC is therefore determined to maintain a high level of mutual trust and confidence between members of staff at all levels and recognises its obligations to protect them from all forms of harassment and victimisation associated with their work.

This Harassment and Bullying Policy and Procedure does not form part of an employee's contract of employment. It exists to provide a framework to allow the employee and NHBC to resolve as quickly as possible any issues of harassment or victimisation.

2. Means of Achievement

Although all staff are responsible for their own behaviour at work, it is also a duty of managers and supervisors to implement this policy and to ensure that it is understood. NHBC will thoroughly investigate all complaints of harassment and bullying having full regard to the confidential and often sensitive nature of these matters. In addition, NHBC will ensure that staff do not suffer subsequent victimisation as a result of making any such complaints.

3. Effects of Harassment & Bullying

Harassment and bullying can lead to under-performance at work, high staff turnover and affect the company's public image. In general terms, harassment can be described as unwanted behaviour, which is unacceptable by normal standards and which has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Bullying can be described as any unsolicited or unwelcome act which humiliates, intimidates, or undermines the individual involved and which is aimed at making that person feel worthless. Examples of bullying behaviour can include verbal insults or ridicule, aggression, bad language and teasing.

Certain types of harassment, for example sexual or racial harassment, are unlawful and may leave the perpetrator and the company liable for damages, sometimes after only a single incident. Therefore, where proven, NHBC will regard any form of harassment as a serious disciplinary matter and, depending on the nature and circumstances of the offence, this may lead to dismissal.

4. Effects of Alleging Harassment and Bullying

Staff will not normally be subject to any disciplinary action as a result of making a complaint of harassment or bullying. However, if after a thorough investigation NHBC considers the complaint

made to be baseless and to have been brought as a result of malicious intent, then the complainant will not be immune from disciplinary action.

5. Examples of Harassment

It is important for all staff to understand that their colleagues may have a variety of grounds on which they feel they are being harassed. It is possible for people to abuse their power over others in a number of ways and, although this list is not exhaustive, these may include references to:

- race, ethnic origin, nationality and skin colour
- sex or sexual orientation or gender change
- membership or non-membership of the staff association or trade union
- disabilities, sensory impairments or learning difficulties
- age
- health - including AIDS/HIV
- physical characteristics
- religion or personal beliefs

There are also many different forms of harassment and these may include:

- intrusion, bullying, physical contact, violence
- abusive or offensive language, racial abuse, insensitive jokes and pranks
- obscene gestures, letters or other communications, graffiti
- lewd comments about appearance, unwelcome sexual advances or suggestions
- isolation or non co-operation

6. Bullying on Site

Employee Role

- Within the NHBC Rules the builder is required to give access on site for inspection and other NHBC staff. That does not give the builder (or his site manager) right to abuse NHBC staff in any way. In fact the builder has a duty of care to ensure our safety on site.
- If there is an indication of confrontation or aggression, our role is to remain professional and not retaliate. We should leave site immediately to prevent escalation.
- Immediately after leaving site the NHBC employee must contact their line manager.

Line Manager Role

- Notify the appropriate Head of department immediately.

Advise the builder's management what has happened if it was the site manager who acted improperly. Advise that we cannot return to site until the matters has been resolved by the builder. Keep HR fully informed and follow any advice offered by HR. Where appropriate, the Company Solicitor will also be informed.

7. Meetings at Home

NHBC staff should not hold meetings with external clients in their own homes, except for where there is a specific personal or business requirement for a home visit. It is recommended that meetings with NHBC staff are not held in the homes of home-workers. In particular team meetings should not be held at home. NHBC's liability extends only to those parts of the house normally used for work and for the normal activities of the home-worker and team meetings would fall outside of this.

8. Informal Remedies

Staff who believe that they are victims of minor offences of harassment or bullying are encouraged to resolve the situation, as soon as is reasonably practical, by talking politely and informally with the person/persons concerned, making it clear that the behaviour is unacceptable and must stop. If the victim feels unable to do this, then a written request, explaining the distress that the behaviour is causing, handed to the harasser/harassers may be an effective alternative. The HR team can assist employees in taking such action.

If an informal remedy is not appropriate or if it fails to prevent a recurrence, then formal procedure should be followed.