

Plymouth CAST Staff Anti-Bullying and Harassment Policy

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Document Control

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The electronic version is the definitive version of this document.

The content of this procedure may be subject to revision from time to time following consultation with the recognised trade unions.

Version Changes

Version	Page Number	Details of Change	Agreed By	Date

1. Vision and Values

- 1.1. Plymouth CAST is a multi-academy trust of Catholic schools which is part of the mission of the Catholic Church dedicated to human flourishing and the building of a kingdom of peace, truth and justice. The Trust is to be conducted in all aspects in accordance with canon law and the teachings of the Roman Catholic Church and at all times to serve as a witness to the Catholic faith in Our Lord Jesus Christ.
- 1.2. Our vision and values are derived from our identity as a Catholic Trust. Central to our vision is the dignity of the human person, especially the most vulnerable. Our academies are dedicated to providing an education and formation where all our pupils and young people flourish in a safe, nurturing, enriching environment. All governors in our academies are expected to be familiar with the vision, mission, values and principles of the Trust and not in any way to undermine them. They should support and promote the vision and conduct themselves at all times in school and on school business according to the vision and principles of the Trust
- 1.3. Plymouth CAST expects all its employees to recognise their obligations to each school within the Multi-Academy Trust, the public, pupils and other employees and to provide consistently high standards of education and performance at all times and in accordance with Plymouth CAST's vision, mission and principles.

2. Scope

Plymouth CAST recognises it is the right of every individual working within the Trust to be able to attend work and perform their duties without being subjected to any form of bullying or harassment.

This policy applies to all individuals working within our schools and central office including employees (regardless of their contractual status i.e. permanent, casual etc), consultants, contractors, agency workers, volunteers and job applicants.

This policy covers bullying and harassing behaviours amongst employees and employees of other organisations, where these impact the working environment. The behaviour can be by an individual or a group, also known as mobbing. It can be face-to-face, verbal, written or via electronic methods, including cyber-bullying and cyber-harassment.

3. Purpose

- 3.1. The purpose of this policy is to ensure all staff understand they have the right to be treated with dignity and respect. Bullying and harassment are not acceptable forms of behaviour to others within the Trust and will not be permitted, condoned or tolerated.
- 3.2. It is to raise awareness and outline Plymouth CAST's position on bullying and harassment within the Trust and to document the process which is followed should any reports of bullying and/or harassment arise.

4. General Principles

- 4.1. Bullying and harassment can occur at any level within an organisation. It occurs in a variety of situations and crosses gender, race and age.
- 4.2. Everyone has an obligation and responsibility to prevent and tackle Bullying and harassment across the Trust.
- 4.3. Harassment because of someone's age, disability, race, religion or belief, sex, sexual orientation or other protected characteristic is unlawful under the Equality Act 2010.
- 4.4. Bullying and/or harassment in the workplace can lead to ill-health and work-related stress. It can also affect staff morale, productivity and poor staff retention. All of these factors could lead to a negative view of Plymouth CAST as an employer.
- 4.5. Any evidence of discriminatory behaviour or harassment within the Trust will be investigated and acted on swiftly. Bullying and harassment is often considered a disciplinary matter and, in some cases, may also be a criminal offence.
- 4.6. Bullying and harassment can be a one-off incident or an ongoing pattern of behaviour. It can happen in person or in other ways for example, through email, social media or other messaging tools. It can occur outside of working hours. Regardless of when and how it occurs, any bullying and/or harassment involving employees should be considered a workplace issue.
- 4.7. Whilst staff should share information as soon as reasonably possible, it should also be emphasised that it is never too late to share concerns of bullying and/or harassment where there is evidence of such behaviour and a delay should never be seen as a barrier to sharing. Each report will be considered on a case by case basis.
- 4.8. Where there is evidence of bullying and/or Harassment or a formal complaint is substantiated, such circumstances will be investigated under the Plymouth CAST Disciplinary Policy and Procedure.
- 4.9. The Trust will support and protect employees who make complaints or who participate in good faith in any investigation. Employees must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated or victimised someone in this way may be subject to disciplinary action.
- 4.10. What some people might consider as joking or 'banter' is not a defence in bullying or harassment, nor is it ever appropriate to dismiss such unwelcome behaviour as trivial.
- 4.11. Lack of intent to either Bully or Harass someone is not a defence in such cases.
- 4.12. Employees who feel they have been the subject of bullying and/or harassment can seek support from their line manager, Plymouth CAST HR, or a trade union representative for support and assistance.

5. Equal Opportunities

- 5.1. Plymouth CAST is committed to providing an inclusive, supportive and safe environment for everyone who works within the Trust. This policy must always be applied fairly and in accordance with employment law and Plymouth CAST Equal Opportunities Policy.
- 5.2. This policy complies with current legislation and meets the aims of the Equality Act 2010.

6. Responsibilities

- 6.1. Everyone working on a Plymouth CAST site has a responsibility under this policy to prevent and eliminate bullying and harassment, and will act in accordance with the guidance of this policy and the Plymouth CAST Staff Code of Conduct.
- 6.2. Senior Leaders and Line Managers:
 - 6.2.1. Have a defining influence on our working culture and set the tone for expectations around behaviour and workplace civility. Senior Leaders and Line Managers will embed and live the values and behaviour that underpin dignity, respect and inclusion.
 - 6.2.2. Have a responsibility to ensure they understand and are committed to the rights and entitlements of all employees to attend work and perform their duties, without fear of being Bullied or Harassed in any form.
 - 6.2.3. Will ensure they have read this policy and understand what constitutes bullying or harassing behaviour.
 - 6.2.4. Will take all reasonable steps to prevent and eliminate bullying and/or harassment of any form.
 - 6.2.5. Will provide and create an environment which discourages bullying, harassment and victimisation and set an example by their own behaviour.
 - 6.2.6. Will take all complaints seriously and manage these promptly, sensitively and confidentially.
 - 6.2.7. Will create a culture in which staff feel they can openly report any concerns relating to bullying and/or harassment of any form within the Trust.
 - 6.2.8. Will identify, challenge and deal with unfair treatment if they become of any or are accused of such behaviours.
 - 6.2.9. Will assess the seriousness of the complaint and determine whether the matter should be addressed under informal resolution.

- 6.2.10. Will consider signposting employees to any support mechanisms to maintain health and wellbeing.
- 6.3. Employees, volunteers and those working within the Trusts schools:
 - 6.3.1. Will ensure they are clear of the expectations the Trust requires of them as outlined within this Policy and the Plymouth CAST Staff Code of Conduct, particularly treating others with dignity and respect.
 - 6.3.2. Will support the Trust in taking all reasonable steps to prevent and eliminate bullying and harassment.
 - 6.3.3. Will contribute to a dignified working environment in which bullying and harassment are unacceptable and consider personal behaviours that might be seen as such.
 - 6.3.4. Will share any concerns in relation to an employee, volunteer or person working within the school's behaviour if they feel this constitutes bullying and harassment.
 - 6.3.5. Will refer to their line manager, or appropriate person if they are concerned about how their behaviour may have been interpreted, or on reflection, re-evaluate their behaviour as one that may have been in contrary to the Trust Staff Code of Conduct and the Trusts expectations as set out within this policy.
 - 6.3.6. Take time to consider whether the behaviours they have experienced are bullying and/or harassing in nature and if so, what outcome they would seek to achieve.
 - 6.3.7. Raise awareness of issues and make appropriate internal disclosure when they are informed of, or are aware, that an act of bullying or harassment has occurred, at the earliest opportunity.
 - 6.3.8. Respond constructively where they are accused of bullying and harassing behaviours.
 - 6.3.9. Will support the Headteacher and Trust in promoting a working environment whereby staff feel they can appropriately raise concerns.
- 6.4. HR and School Business Managers
 - 6.4.1. HR and School Business Managers will advise line managers and senior leaders in the application of this policy.

7. What is Bullying

- 7.1. Bullying is not currently defined within legislation. ACAS define the characteristics of bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate or cause physical or emotional harm to someone.
- 7.2. It is important to make a distinction between bullying and firm management.

 Legitimate, reasonable and constructive criticism of an employee's performance or behaviour, including managing under performance or making unpopular decisions will not, by itself, amount to bullying. Neither will reasonable instructions given to employees in the course of their employment.
- 7.3. The below examples of bullying behaviour is not an exhaustive list:
 - Shouting or swearing at a colleague
 - Persistent negative and inaccurate attacks on a colleague's personal or professional performance
 - Criticising a colleague in front of others
 - Spreading malicious rumours / making malicious allegations
 - Threatening behaviour, both verbal and physical
 - Body language and non-verbal communication which is inappropriate e.g. invading personal space, gestures and facial expressions.
 - Use of inappropriate tone, language and quantity of emails e.g. inappropriate use of capital letters
 - Cyber bullying including the use of internet, mobile technology, social media, messaging platforms, gaming platforms or mobile phones to harass, bully, or cause harm to another.
 - Behaviour perceived as intimidating
 - Persistently setting objectives with impossible deadlines or unachievable tasks
 - Removing and replacing areas of responsibility with menial or trivial tasks and taking credit for work achieved
 - Undervaluing a colleague's contribution, placing unreasonable demands on and / or over-monitoring a colleague's performance
 - Withholding information with the intent of deliberately affecting a colleague's performance
 - Isolating staff
 - Preventing staff accessing opportunities
 - Inappropriate, unfair and / or inconsistent use of management policies or procedures.
- 71.2. Bullying can also happen from employees towards someone more senior, for example a line manager. This is sometimes called 'upward bullying' or 'subordinate bullying'. It can be from one employee or a group of employees. Examples of upward bullying can include:

- Showing continued disrespect
- Refusing to complete tasks
- Spreading rumours
- Constantly undermining someone's authority
- Doing things to make someone seem unskilled or unable to do their job properly

8. What is Harassment/Sexual harassment

- 8.1. Under the Equality Act 2010 there are three types of harassment which are prohibited. These are harassment related to a protected characteristic, sexual harassment and less favourable harassment.
- 8.2. Under the Equality Act 2010, harassment is defined as: "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual". Sexual harassment is unwanted conduct of a sexual nature that has that effect.
- 8.3. Protected characteristics are:
 - age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief
 - sex
 - sexual orientation

It may also relate to other personal characteristics such as weight, social status, or trans identities, including non-binary.

- 8.4. What some people might consider as joking, 'banter' or part of their workplace culture, it is still harassment if:
 - The behaviour is of a sexual nature (sexual harassment).
 - It's unwanted.
 - It violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.
- 8.5. Examples of harassing behaviour are listed below:
 - Offensive comments, 'banter', telling offensive jokes.
 - Ostracising, ignoring and staring.
 - Patronising comments and remarks
 - Mimicking

- Use of derogatory terms
- Demeaning or humiliating behaviour or language.
- Inappropriate and intrusive questions.
- Belittling or demeaning comments or nicknames
- Assault or other non-accidental physical contact, including disability aids
- The display, sending or sharing of offensive letters, publications, objects, images or sounds.
- Graffiti
- Offensive comments about appearance or clothing
- Deliberate and consistent behaviours which demonstrate a non-acceptance of aspects relating to protected or personal characteristics, for example, failure to use requested gender pronoun for a transitioning individual
- 8.6. Examples of sexual harassment are listed below and should be read in conjunction with the examples of harassment:
 - 8.6.1. Persistent attempts to make contact with a colleague/employee, for example through email, telephone, social media, or on behalf of a third party
 - 8.6.2. Following, watching or photographing an employee.
 - 8.6.3. Repeatedly sending overly personal, malicious or threatening messages or items.
 - 8.6.4. Continuing to make contact with a colleague and employee after they have asked for contact to cease.
 - 8.6.5. Flirting, gesturing or making sexual remarks about someone's body, clothing or appearance.
 - 8.6.6. Indecent exposure.
 - 8.6.7. Sexual images displayed or shared.
 - 8.6.8. Making sexual comments or jokes about someone's sexual orientation or gender reassignment.
 - 8.6.9. Stalking, including online stalking.
 - 8.6.10. Sexual gestures, such as simulating sexual acts.
 - 8.6.11. Unwanted touching, such as putting a hand on someone's knee or hugging them.
 - 8.6.12. Unwanted and unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome
 - 8.6.13. Coercing someone into sexual relations through pressure, manipulation or threats, or offering rewards in exchange for sex (for an example a promotion, salary increases etc).
 - 8.6.14. Leering, whistling or making sexually suggestive comments or gestures, innuendoes or lewd comments
 - 8.6.15. Sexual violence, assault including rape, or threatening to carry out sexual violence or unwanted sexual acts.
- 8.7. Both examples for harassment and sexual harassment are not an exhaustive list.

- 8.8. Less favourable harassment is when someone experiences less favourable treatment because of how they responded to previous harassment. Harassment happens when the person is treated less favourably than they would have been if they had not responded to the previous harassment in the way they did. The previous harassment must have been either:
 - Sexual harassment
 - Harassment related to sex
 - Harassment related to gender reassignment
- 8.9. An example of behaviour that can amount to less favourable treatment could include:

A manager propositions one of their team and the advance is rejected. The manager then begins to give the employee more work and becomes critical of their performance.

- 8.10. Harassment is still against the law even if the person being harassed does not ask for it to stop.
- 8.11. It's possible that serious harassment could also be a hate crime.

9. Complaints of bullying and harassment

- 9.1. The procedure for bullying and/or harassment cases involving other employees is shown in the anti- bullying and harassment policy flowchart in appendix 1.
- 9.2. Resources are also available to support employees to consider whether their experiences fall within bullying and harassment:
 - 9.2.1. Bullying self-reflection tool in appendix 2.
 - 9.2.2. Harassment self-reflection tool in appendix 3.
- 9.3. All reports of bullying and harassment will be treated seriously, sensitively and fairly. Line managers responding to complaints should listen, provide reassurance, respect thoughts and opinions whilst ensuring they keep an open mind by not letting their own opinions influence matters.
- 9.4. The complainants line manager will provide support and ascertain the nature of the complaint and the wishes of the complainant.

10. Emotional support

10.1. Experiencing inappropriate behaviour can make working life miserable and take an emotional, physical, and mental toll on employees.

- 10.2. If you are experiencing bullying and/or harassment, have been accused or are supporting your colleague and you need support or someone to talk to; Employees of Plymouth CAST have access to a free confidential counselling service, details of which can be located on the Plymouth CAST Wellbeing Hub.
- 10.3. Line managers can also provide employees with access to Occupational Health Services and/or a Stress Risk Assessment if required.

11. Informal Intervention

- 11.1. Usually the best approach for resolving concerns is ensuring the other party is aware of the impact of their behaviour.
- 11.2. Where an employee has concerns about the behaviour of an individual, they should tell them that their behaviour is causing concern or offence, explain the effect that it is having on them and that it must stop. This could be done either verbally or in writing, however, verbally is encouraged to maintain good working relationships. The employee may not be aware that their actions cause offence to others and once it is highlighted this may resolve the situation.
- 11.3. This informal approach is about making the individual aware, in a non-confrontational or non-threatening way, that their behaviour is upsetting and unacceptable and providing them with the opportunity to acknowledge the effect of their behaviour and address it.
- 11.4. This informal process is in accordance with the Plymouth CAST Grievance Policy and Procedure.
- 11.5. If the complainant finds speaking to the other party too difficult but still wishes to seek an informal resolution, they can ask their line manager to relay their concerns to the individual in an agreed format.
- 11.6. If the complaint is against an individual's line manager, the employee should liaise with either the next more senior manager or contact the Trust HR Department for further advice.
- 11.7. Should a report of bullying and/or harassment be received through a bystander and not come directly from the person being harassed, line managers should confidentially speak to the person affected and provide them with advice on their rights to report matters as per this policy.
- 11.8. Line managers will assess the risks arising from the parties continuing to work together while the concern is being addressed and consider alterations to working arrangements that would support this, if possible.

- 11.9. It is recognised that an informal solution is unlikely to be appropriate in serious cases or where the alleged harasser is unlikely to accept that they have done anything wrong. In any event employees are able to instigate the formal process at any stage should they wish to do so.
- 11.10. Line Managers and Senior Leaders will inform individuals of their rights under the Trust's Grievance Policy and Procedure, Disciplinary Policy and Procedure and Equal Opportunities Policy.

12. Mediation

- 12.1. Mediation is a voluntary impartial process and can be used in alleged bullying and harassment cases where both parties are willing to participate and the complaint isn't considered to be a disciplinary matter.
- 12.2. The Plymouth CAST Grievance Policy and Procedure outlines the process for mediation

13. Formal Process

- 13.1. Where it has not been possible to resolve an individual's concern or complaint informally, the employee can choose to raise a formal grievance.
- 13.2. The Plymouth CAST Grievance Policy and Procedure sets out the process for raising a formal grievance.
- 13.3. Should the Trust become aware of bullying and/or harassment within the workplace which is not reported by the individual but is deemed to be a conduct matter, the Trust may consider formal action on the individual's behalf.
- 13.4. In cases where there is evidence of bullying and/or harassment without a formal grievance being submitted by the complainant, the Disciplinary Policy and Procedure will be invoked.

14. Self-Reporting

- 14.1. There may be occasions that arise where an individual working finds themselves in a situation which could have been misinterpreted or might appear compromising to others. Equally, an individual may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Trust's Staff Code of Conduct.
- 14.2. In such situations, individuals should speak openly with their line managers about their behaviour.
- 14.3. Self-reporting in these circumstances can be seen as a positive step for the following reasons:

- It is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity.
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.
- It is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

15. Behaviour outside work

15.1. If employees experience unwanted or offensive behaviour that happens outside of the workplace but is still relating to work i.e. a work-related social event or training course, the same process for reporting issues will apply.

16. Vexatious, malicious and frivolous complaints

16.1. Please refer to the Plymouth CAST Grievance Policy and Procedure.

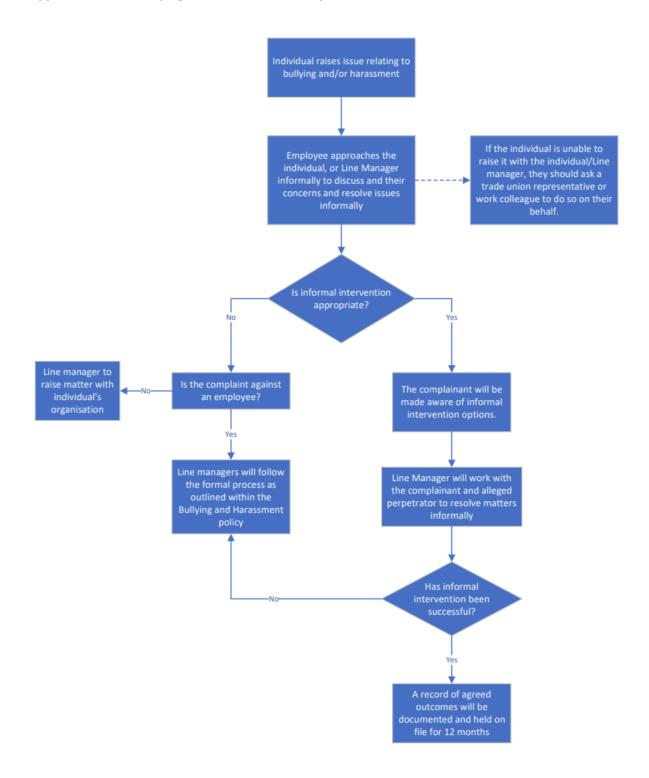
17. Complaints against Third Parties

- 17.1. Sometimes the allegation of bullying or harassment may be against someone an employee comes across as part of their work e.g. a supplier, contractor or visitor. In these cases the complaint should be raised with the line manager or Headteacher who will then discuss how best to deal with the situation. Where the line manager or Headteacher is unavailable e.g. due to sickness or leave, employees should raise their concern with the line manager's manager
- 17.2. In a school environment, there are stakeholders notably parents/carers over which the school and Trust leadership have no direct authority. In a situation where there is an allegation of bullying or harassment, in person or online, towards an employee, the Trust may consider legal advice, or seek recourse to the police in order to investigate. The employee should be supported throughout any period of investigation, and beyond it if necessary.
- 17.3. There may be an allegation of bullying or harassment made against a member of the School's Local CAST Board (LCB) or a director of the Trust Board. In such circumstances, the Trust would seek to investigate potentially supported by an external organisation should the allegation concern a director. This may require a suspension from the relevant body, as a neutral act, whilst an investigation is being conducted. Following the conclusion of an investigation, the Trust would act accordingly. This may include censure by, or removal from, the body (LCB or Board) with which the individual is associated where evidence of wrongdoing has been found.

18. Post employment complaints

18.1. An employee who has left employment and wishes to raise a complaint, should follow the procedure set out in the Plymouth CAST Grievance Policy and Procedure.

Appendix 1: Anti-Bullying and Harassment Policy flowchart



Appendix 2: Bullying self-reflection tool

Appendix 2 - Bullying Self Assessment Tool.pdf

Am I being bullied at work reflection tool

This tool aims to help you reflect on behaviours you are experiencing in the workplace, and to help you determine whether they fall within the Plymouth CAST Staff Anti-Bullying and Harassment Policy.

This is for personal use and does not form part of the formal process. Any of the behaviours can be by individuals or a group (mobbing), using verbal, non-verbal, written or electronic communications.

It is not always easy to differentiate between appropriate behaviours and bullying and harassment, particularly in the relationship between you and your manager. Here are a few comparisons to help you think about this.

Appropriate Behaviour	Inappropriate Behaviour
Consistent	Inconsistent
Shares information	Withholds selectively
Fair	Has favourites
Truthful	Distorts the truth, fabricates
Delegates	Abdicates
Builds team spirit	Creates fear and divides
Leads by example	Sets a poor example
Listens	Snaps
Admits mistakes	Blames others
Challenges constructively	Avoids conflict

It is accepted that these descriptions represent extremes of behaviour, although in practice things may not be so clear and individuals may display characteristics which fall somewhere in the middle

Using the scale of 1 to 5 please indicate how often you have experienced the following behaviours within the last 6 months.

How often are you experiencing?	1	2	3	4	5
Being shouted or sworn at					
Persistent negative and inaccurate attacks on your personal or professional performance					
Being criticised in front of others					
Malicious rumours being spread about you					
Threatening behaviour (verbal and physical)					
Inappropriate body language/non-verbal communication					
Emails which are inappropriate in tone, language or use of grammar					
Inappropriate behaviour on social media platforms					
Threatening or intimidating behaviour					
Being set objectives with impossible deadlines or unachievable tasks					
Removal/replacement of responsibility with menial or trivial tasks and/or taking credit for work achieved					
Having your contribution to the workforce undervalued					
Being isolated					
Prevented from accessing opportunities					
Inappropriate, unfair and / or inconsistent use of management policies or procedures					
Having your contribution to the workforce undervalued					
Micromanaging/over-monitoring performance without good cause					
Withholding information with the intent of deliberately affecting your performance					

Appendix 3: Harassment self-reflection tool

Appendix 3 - Harassment Self Assessment Tool.pdf

Am I being harassed at work reflection tool

This tool aims to help you reflect on behaviours you are experiencing in the workplace, and to help you determine whether they fall within the Plymouth CAST Staff Anti- Bullying and Harassment Policy.

This is for personal use and does not form part of the formal process. Any of the behaviours can be by individuals or a group (mobbing), using verbal, non-verbal, written or electronic communications.

Harassment should be related to one or more of the following protected or personal characteristics:

- Age (covers all age groups)
- Disability (mental and physical health)
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (colour, nationality, ethnicity, national origins).
- Religion or beliefs
- Sex / gender
- Sexual orientation
- Other personal characteristics such as weight, social status, trans identities including non-binary, carers responsibilities, physical appearance

Using the scale of 1 to 5 please indicate how often you have experienced the following behaviours within the last 6 months.

1 = Never	2 = Now and then	3 = Monthly	4 = Weekly	5 = Daily
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How often are you experiencing?	1	2	3	4	5
Offensive comments, 'banter', telling offensive jokes.					
Ostracising, ignoring and staring.					
Patronising comments and remarks					
Mimicking					
Use of derogatory terms					
Demeaning or humiliating behaviour or language					
Inappropriate and intrusive questions.					
Belittling or demeaning comments or nicknames					

Assault or other non-accidental physical contact, including disability aids				
The display, sending or sharing of offensive letters, publications, objects, images or sounds.				
Graffiti				
Offensive comments about appearance or clothing				
Deliberate and consistent behaviours which demonstrate a non-acceptance of aspects relating to protected or personal characteristics, for example, failure to use requested gender pronoun for a transitioning individual				
The below list is specifically for sexual h	arassme	ent		
Persistent attempts to make contact with a colleague/employee, for example through email, telephone, social media, or on behalf of a third party				
Following, watching or photographing an employee.				
Repeatedly sending overly personal, malicious or threatening messages or items.				
Continuing to make contact with a colleague and employee after they have asked for contact to cease.				
Flirting, gesturing or making sexual remarks about someone's body, clothing or appearance.				
Indecent exposure.				
Sexual images displayed or shared				
Making sexual comments or jokes about someone's sexual orientation or gender reassignment.				
Stalking, including online stalking.				
Sexual gestures, such as simulating sexual acts.				
Unwanted touching, such as putting a hand on someone's knee or hugging them.				
Unwanted and unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome				

Coercing someone into sexual relations through pressure,			
manipulation or threats, or offering rewards in exchange for sex			
(for an example a promotion, salary increases etc).			
Leering, whistling or making sexually suggestive comments or			
gestures, innuendoes or lewd comments			
Sexual violence, assault including rape, or threatening to carry			
out sexual violence or unwanted sexual acts.			