



Global Banking School
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1. Policy Statement

1.1. Global Banking School (GBS) is committed to maintaining a professional work environment in which all individuals are treated with respect and dignity. Accordingly, no form of bullying, harassment or sexual harassment is tolerated by or against employees, contractors, vendors, students, third parties or any other individuals who conduct business with the Company. Any violation of this policy, including inappropriate actions or failure to act, may result in disciplinary action, up to and including dismissal.

2. Scope

2.1 This policy applies to bullying/harassment not only by fellow employees but also by a client, student or other business contact with whom an employee might reasonably expect to come into contact in the course of their employment.

3. Policy Overview

3.1 This policy defines bullying and harassment (including sexual harassment) and sets out the procedures that the Company has in place and will adhere to should any employee make a complaint that they have been the victim of bullying or harassment (including sexual harassment).

3.2 Complaints by employees under this policy will be treated with fairness and sensitivity and in as confidential a manner as possible.

3.3 Any employee accused of bullying or harassment under this Policy will be afforded natural justice and treated with fairness and sensitivity.

4. Definitions

4.1 Who is protected from harassment

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;

religion or belief;
sexual orientation; and
age.

4.1.1

4.2.4 Disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.

4.2.5 A single incident can amount to harassment.

4.3 **Sexual harassment**

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:

- Jokes, innuendos or gestures of a sexual nature;
- Sexually-charged computer programs, emails or messages;
- Demearing language or behaviour that is based on sex;
- Compliments about a person's body of a sexual nature;
- Repeated requests for a date despite refusals;
- Unwelcome sexual advances;
- Requests for sexual favours;
- Questions or comments about personal or intimate sexual matters;
- Deliberately brushing up against someone else;
- Sexual epithets or name-calling;
- Sexually intimidating behaviour or ridicule;

4.4 **Bullying**

Bullying is the repeated abuse of power or position to undermine a person so that their confidence and self-esteem/self-worth are weakened or destroyed. Bullying may happen in public or in private. It may arise from the personal style of the bully, and attacks may be irrational, unpredictable, and unfair. An isolated incident of the behaviour in this definition may be an affront to not considered to be bullying

4.4.1 The following is a non-exhaustive list of examples of types of bullying:

- Exclusion with negative consequences
- Verbal abuse/insults
- Being treated less favourably than colleagues
- Intrusion pestering, spying or stalking
- Menacing behaviour
- Intimidation
- Aggression
- Undermining behaviour
- Excessive and unreasonable monitoring of work
- Humiliation
- Withholding work-related information

It is important to note that the following do not constitute bullying:

- Expressing differences of opinion strongly
- Offering constructive feedback, guidance, or advice about work-related behaviour which is not of itself welcome
- Ordinary performance management
- Reasonable corrective action taken by an employer or supervisor relating to



4.7.1 If we find that the allegation is well-founded, we will take the steps we deem necessary in order to remedy this complaint. This can include, but is not limited to:

- warning the individual about the inappropriate nature of their behaviour
- banning the individual from Company premises
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6.1 Responsibilities of Management

GBS



- Respond sensitively to an employee who makes a complaint of bullying, harassment or sexual harassment.
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12.1 **Mediation**

Mediation involves parties seeking to arrive at a solution through mutual agreement rather than through an investigation and decision so is an alternative method of resolving issues relating to bullying and harassment. Mediation provides a confidential opportunity for the person who feels that he/she has been bullied or harassed and the alleged harasser of this inappropriate behaviour to discuss the matter and to reach an agreement on their continuing working relationship.

12.1.1 Mediation is conducted in private, directly between the parties concerned, with the support of a Mediator, who acts as an independent facilitator. Either party may withdraw from the process at any time by notifying the mediator, in writing, that he/she wishes to do so.

12.1.2 If the Company deems it appropriate and both parties agree to resolve the issue by mediation, the Company will seek to arrange a mediation process. An appropriate person, suggested by the Company, acceptable to both parties, from within or outside the Company (at the Company's sole discretion) will be assigned as Mediator.

12.1.3 If the mediation process results in an agreement acceptable to both parties, the process will be closed.

