

# Dignity and Respect at Work Policy

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## About this policy

The purpose of this policy is to ensure that all colleagues are treated and treat others with dignity and respect. It covers harassment, bullying and victimisation which occur either in the workplace or out of the workplace including (but not limited to) at work-related social functions, on business trips or cyber-bullying (bullying online). It covers bullying, harassment and victimisation by colleagues (which may include consultants, contractors and agency workers) and also by third parties such as stakeholders, suppliers or other visitors to Ofcom's premises.

This policy is not designed to discourage normal social relations among colleagues or with the public. Its aim is to prevent bullying, harassment and victimisation.

All Ofcom colleagues are required to familiarise themselves with this policy.

## Policy document

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## 1. Scope

- 1.1 This policy covers all colleagues, consultants, contractors, volunteers, interns, casual workers and agency workers.

## 2. Policy statement

- 2.1 Ofcom is committed to treating all colleagues with dignity and respect in line with our values, and providing an environment that is free from harassment, bullying and victimisation. We want all colleagues to feel empowered to be themselves at all times, and to feel able to perform to the best of their ability in a supportive, open and inclusive environment.
- 2.2 Ofcom expects colleagues to treat each other, and those they interact with through the course of their work, with dignity and respect and to consider whether their words or conduct could be offensive to others. This applies to all channels of communication including face to face, email, instant messaging, Teams, online via any form of social media and applies at all times – including outside work.
- 2.3 Ofcom has a zero-tolerance approach towards any form of bullying, harassment and victimisation of colleagues or stakeholders and such behaviour may be deemed as misconduct and potentially an act of gross misconduct, which may lead to summary dismissal, in accordance with Ofcom's [Disciplinary Policy](#).

## 3. The policy

- 3.1 All colleagues should take the time to ensure that they understand the types of behaviour that are unacceptable under this policy. All people managers will be trained in this policy either through face to face or e-learning modules.
- 3.2 Ofcom will investigate any complaints raised under this policy responsibly.
- 3.3 This document outlines the responsibilities and expectations of both managers and colleagues and sets out the procedure a colleague should follow if they feel that they have been the subject of any form of bullying, harassment or victimisation.
- 3.4 Colleagues who have grievances relating to work issues or their performance rating should refer to the [Grievance Policy](#).
- 3.5 Ofcom will monitor incidents of bullying, harassment and victimisation and the resolution of complaints by means of yearly statistical reporting to the Policy and Management Board and annual Diversity and Inclusion Programme reporting. The purpose of monitoring these complaints is to ensure that we continually seek to improve our practices to be a more inclusive place to work.
- 3.6 The examples used in this policy are for illustrative purposes only and do not relate to any Ofcom colleague.

3.7 This policy does not form part of a colleague's Contract of Employment and Ofcom reserves the right to amend it at any time.

## 4. Roles and responsibilities

Role	Responsibilities
<b>Colleague Responsibilities</b>	<ul style="list-style-type: none"> <li>• All colleagues are responsible for their behaviour at all times and via all communication channels. All colleagues should be aware that if they bully, harass or victimise their colleagues, their actions could result in disciplinary action.</li> <li>• Colleagues can be held personally liable as well as, or instead of the organisation, for any act of harassment or victimisation. Colleagues who commit serious acts of harassment (including sexual assault) may also be guilty of a criminal offence.</li> <li>• We encourage colleagues who observe any acts of bullying, harassment or victimisation to speak up about what they observe. If the colleague feels unable to raise the issue directly with the perpetrator, they should discuss this with their manager or People Advisor. Colleagues can also speak to Colleague Forum representatives or Prospect Union representative for additional support and if necessary to refer your case on your behalf.</li> <li>• It is the responsibility of all colleagues to comply with this policy and to treat individuals with respect and dignity.</li> <li>• Disciplinary action may also be considered against any colleague found to have made malicious or vexatious allegations of bullying, harassment or victimisation.</li> </ul>
<b>Manager Responsibilities</b>	<ul style="list-style-type: none"> <li>• Managers are required to implement this policy and ensure that it is understood by their team(s). Managers must also operate within the boundaries of this policy and take action when behaviour falls below the standards expected.</li> <li>• It may be necessary in serious cases (for example, where it is felt that others could be at risk if no action is taken) for the allegations to be investigated, and if appropriate, disciplinary action taken even if a formal written complaint is not made.</li> </ul>
<b>People &amp; Transformation Team responsibilities</b>	<ul style="list-style-type: none"> <li>• Provide advice, guidance and training to managers who are dealing with an act of misconduct.</li> <li>• Liaise with and support the Investigating Manager to ensure formal investigations are organised appropriately.</li> <li>• Guide the manager in determining whether any proposed companion to accompany a colleague to a formal meeting may be inappropriate and/or could constitute a conflict of interest.</li> </ul>

	<ul style="list-style-type: none"> <li>• Attend hearings in an advisory capacity, where appropriate, and ensure Ofcom’s procedures are followed. Where necessary, they may also make a record of the proceedings.</li> <li>• Put together case report bundles for the hearing manager and the colleague.</li> <li>• Maintain appropriate confidentiality throughout the formal process.</li> </ul>
<b>Investigating Manager Responsibilities</b>	<ul style="list-style-type: none"> <li>• With the help of the People Advisor, organise formal investigations where required.</li> <li>• Establish the facts and all relevant circumstances leading to and contributing to the allegations – care should be taken not to present assumptions as though they are facts.</li> <li>• Give the colleague the opportunity to comment on the facts or to provide mitigating circumstances for their actions.</li> <li>• Gather evidence concerning the specific allegations and confirm whether there is sufficient corroboration for the Hearing Manager to make a decision regarding the allegations, i.e. is there a case to answer?</li> <li>• Remain independent, impartial and maintain confidentiality throughout the process.</li> <li>• Provide a written report for the Hearing Manager which details the established facts, evidence, conclusions and recommendations.</li> </ul>
<b>Companion Responsibilities</b>	<ul style="list-style-type: none"> <li>• Determine whether it is appropriate for them to provide support to the colleague in question in the circumstances or whether such support may constitute a conflict of interest.</li> <li>• They may present the case on behalf of the colleague, but they must not answer any questions on the colleague’s behalf.</li> <li>• They may respond on the colleague's behalf to any view expressed at the hearing.</li> <li>• They must not put forward their own view.</li> <li>• They may confer privately with the colleague during the meeting.</li> <li>• They or the colleague may ask for a short adjournment at any time during the meeting and this would normally be allowed.</li> <li>• They may sum up the case at the end of the meeting.</li> <li>• They must maintain confidentiality throughout the process.</li> </ul>
<b>Hearing Manager Responsibilities</b>	<ul style="list-style-type: none"> <li>• Read all the relevant documentation pertaining to the case including the investigation report and any witness statements ahead of the hearing.</li> <li>• At the hearing, set out the nature of the allegation(s) and ask relevant questions to gain a better understanding of the facts and any mitigating circumstances that should be considered.</li> </ul>

	<ul style="list-style-type: none"> <li>• Ask for names of any witnesses who may be able to provide further information.</li> <li>• Decide on the appropriate outcome of the process.</li> <li>• Maintain confidentiality throughout the process.</li> </ul>
<b>Note Taker Responsibilities</b>	<ul style="list-style-type: none"> <li>• Provide an accurate summary of the key points raised at the meeting.</li> <li>• Type up notes after the meeting and have the notes approved by the Hearing/Investigating Manager.</li> <li>• Send a copy to the colleague and request them to either agree to the notes or respond with their comments within a reasonable timeframe (not less than two working days).</li> <li>• Ensure that meeting notes are handled in line with Ofcom’s data protection and information security requirements.</li> <li>• Maintain confidentiality throughout the process.</li> </ul>

## 5. Ofcom’s definitions

### 5.1 What is harassment?

- a) Harassment is any unwanted verbal, non-verbal or physical conduct which has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. This includes any form of harassment in the digital world, specifically online via social media, email, instant messaging and Teams and includes inappropriate behaviour outside work.
- b) Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
- c) The complainant need not possess the relevant characteristics (detailed above) themselves and can raise a harassment complaint because of their association with a colleague who has the protected characteristic, or because they are wrongly perceived to have one, or are treated as if they do.
- d) A person may be harassed even if they were not the intended “target”. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.
- e) Harassment includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- f) An essential characteristic of harassment is the fact that it is unwanted by the recipient. The perception of the recipient is key. For conduct to amount to harassment it does not matter what the intentions or perceptions of the alleged harasser are. Even unintentional harassment is unacceptable.

- g) Conduct may become harassment if it is continued once it has been made clear that it is regarded by the recipient as offensive. However, a single incident may amount to harassment if it is sufficiently serious.
- h) The following examples of harassment are intended to be guidelines and are not exhaustive when determining whether there has been a violation of this policy:
  - i) Physical, verbal abuse or unwanted physical contact
  - ii) Inappropriate comments, jokes, speculation, for example, about someone's sexuality or disability status
  - iii) Unwelcome comments or behaviour via social media, email, instant messaging, Teams, face to face, both in and outside the workplace
  - iv) Making stereotypical assumptions
  - v) Displaying or circulating offensive material, for example, homophobic, biphobic, transphobic or pornographic pictures
  - vi) Unwanted sexual conduct (whether this be verbal, non-verbal or physical)

Excluding people on the grounds of their race, ethnicity or national origin, sex, sexual orientation, gender reassignment, gender identity, disability, religion or belief, age.

**Examples of harassment and sexual harassment:**

- 1) Faisal, is subjected to insulting and humiliating comments in front of his colleagues by his line manager because he is Muslim. Faisal could lodge a harassment complaint related to the protected characteristic of religion or belief. In addition, if Faisal's colleagues are also present when these comments are made, even though the comments made are not directed at those colleagues, they may also bring a harassment complaint related to the protected characteristic of religion or belief as the line manager is creating an intimidating and offensive environment.
- 2) Steve is continually teased for being gay and is called names by a group of colleagues at work. Derogatory homophobic comments have been posted on the team's Yammer group about him by colleagues in his team. Steve was recently physically pushed to the floor by one member of the team but is too scared to take action. Steve is not gay but heterosexual; furthermore, the team know that he isn't gay. This is harassment related to sexual orientation.
- 3) The team have their yearly Christmas meal and some colleagues including the manager Julie and one of her direct reports Brian, stay on afterwards for drinks. Julie makes sexual advances towards Brian. Brian is not happy about Julie's behaviour and raises this instance of sexual harassment with Julie's line manager the next day.
- 4) Amber works in the IT team. She is part of a 'WhatsApp' group with her IT team members. Two of the other 'WhatsApp' group participants start sending sexually explicit images on the 'WhatsApp' group. Amber feels very uncomfortable about this and reports it to the People and Transformation team. This can amount to sexual harassment.

- i) A colleague can make a complaint to Ofcom where they are harassed by someone who doesn't work for Ofcom, such as a customer, stakeholder etc. As an employer, once we are aware of such unwanted behaviour, we will take reasonable and proportionate action to address the issues.

**Example of harassment at work by non-colleagues:** Sheila manages the Customer Service Centre. One of her staff, Raj, is from a minority ethnic background. Raj mentions to Sheila that he is feeling unhappy after a caller made derogatory remarks regarding his accent.

## 6. Bullying

### 6.1 What is bullying?

- a) Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying does not relate to an individual's protected characteristic.
- b) Bullying can take the form of physical, verbal or non-verbal conduct and can involve arguments and rudeness, but it can also be more subtle, for example, the way a colleague talks to another, the tone that a manager uses when giving feedback to their direct report. Excluding and ignoring people and their contribution, unacceptable criticisms and overloading people with work are other forms of bullying.
- c) Giving legitimate and reasonable feedback on a colleague's performance in a constructive way with suggested actions / direction on how performance can be improved does not constitute bullying. Managers must pay attention to behaviour and language when giving such feedback and ensure it is supported by relevant evidence. All people managers are required to enhance their conversational skills through Ofcom's mandatory training.

#### **Examples of bullying:**

- 1) Joe is a manager, he regularly shouts instructions at Jamie, constantly berating him for not doing a good job and regularly picks on him. Jamie is unsure of why Joe acts this way towards him. Feedback from his customers is always outstanding. Jamie raises these issues with his People Business Partner.
- 2) Anne manages a small team, one of her team members Kelly spreads rumours about her management style which in turn, leads to the whole team ostracising her, deliberately ignoring her in the workplace and excluding her from team social events, where she would normally be invited to. Anne raises these issues with her line manager.



## 7. Victimisation

### 7.1 What is victimisation?

- a) Victimisation occurs where a colleague is subjected to detriment, such as being denied a training opportunity or promotion, because they made or supported a complaint, raised a grievance or because they are suspected of doing so.

**Example of Victimisation:** John, who is blind, raises a grievance that his employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings. Such behaviour could amount to victimisation.

## 8. Informal procedure

- 8.1 Ofcom's aim is to try and resolve issues raised under this policy informally, where it is reasonable to do so. If a colleague feels they are being bullied, harassed or victimised, we encourage them to try and raise their concerns informally with the person responsible, if they feel able to do so. The colleague should explain that their behaviour is not welcome or makes them feel uncomfortable.
- 8.2 If this is too difficult, they should speak to their line manager in the first instance. If this is not appropriate, they should speak to their manager's manager for advice or guidance. Alternatively, the People Advisors can provide confidential advice and assistance in helping resolve the issue informally or advice on how to raise a concern formally.
- 8.3 Following initial discussions, the possible outcomes could be:
  - a) decide that no further action is necessary;
  - b) discuss the concern with the person responsible;
  - c) ask their manager and/or People Advisor to help resolve the matter through informal and discreet approaches to the person responsible; or
  - d) make a formal complaint using the formal procedure.
- 8.4 It is recognised that often the person whose behaviour is called into question may not know that their tone and/or behaviour is offensive and hurtful to another colleague. We encourage colleagues to discuss the behaviour informally in the first instance to allow the other person the opportunity to adjust their behaviour.
- 8.5 If the unwanted behaviour continues, the colleague should raise the matter formally as set out in Section 6.

- 8.6 If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your line manager or People Advisor informally for confidential advice.

## 9. Formal procedure

- 9.1 If informal steps have not been successful or are not possible or appropriate, the colleague should raise a formal complaint in writing to their People Advisor.
- 9.2 As far as possible, the written complaint should set out full details of the conduct in question, including the name of the harasser or bully or person who has subjected them to a detriment, the nature of the act, date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.
- 9.3 As a general principle, the decision as to whether to progress a complaint or not is up to the colleague. However, Ofcom has a duty to protect all colleagues and may pursue the matter independently if, in the circumstances, it considers it is appropriate to do so.
- 9.4 Ofcom will investigate complaints in a timely and, to the extent possible, confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. Details of the investigation and the name of the person making the complaint and the person accused will only be disclosed on a "need to know" basis. The investigation will be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.
- 9.5 Ofcom will arrange a meeting with the colleague, where possible within **five working days** of receiving the complaint, so that the colleague can give their account of events. They have the right to be accompanied by a Prospect Union representative, Colleague Forum representative or work colleague of their choice, who must respect the confidentiality of the investigation.
- 9.6 Colleagues raising a complaint will be kept informed of the general progress of the investigation.
- 9.7 Ofcom will consider whether any steps are necessary to manage any on-going relationship between the colleague raising the complaint and the individual(s) referred to in the complaint, whilst the investigation is underway. Where the complaint is about a colleague, Ofcom may consider suspending them on full pay or making other temporary changes to their working arrangements such as working from home and/or pending the outcome of the investigation. Ofcom will also consider any request that the colleague raising the complaint makes for changes to their own working arrangements during the investigation.
- 9.8 The investigator will also meet with the individual who is the subject of the complaint to hear their account of events. They will be told the details of the allegations against them, so that they can respond.

- 9.9 It may be necessary to interview witnesses to any of the incidents mentioned in the complaint. If so, the importance of confidentiality will be emphasised to them.
- 9.10 From time to time, Ofcom may engage an external, independent investigator to investigate the complaint, the final decision of the outcome of the complaint will lie with Ofcom.
- 9.11 At the end of the investigation, the investigator will submit a report to the senior manager nominated to consider the complaint. The senior manager will arrange a meeting with the colleague raising the complaint, where possible within **five working days** of receiving the report, in order to discuss the outcome and what action, if any, should be taken. The colleague has the right to be accompanied by a trade union representative, colleague forum representative or work colleague of their choice.
- 9.12 If the senior manager considers that harassment, bullying or victimisation has occurred, prompt action will be taken to address it.
- 9.13 Where the harasser, bully or person responsible for victimising is a colleague the matter will be dealt with as a case of possible misconduct or gross misconduct under Ofcom's Disciplinary Policy.
- 9.14 During the investigation stage and whether or not the complaint is upheld, Ofcom will consider how best to arrange the on-going working relationship between the colleague and the individual who is the subject of the complaint. At any stage of the process, it may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.
- 9.15 If the harasser, bully or person responsible for victimising is a third party such as a client or other visitor, Ofcom will consider what action would be appropriate to deal with the issue. Whether or not the colleague's complaint is upheld, Ofcom will consider how best to manage any on-going business relationship between the colleague that raised the complaint and the third party.
- 9.16 Ofcom will take all reasonable steps to ensure that any colleague who makes a complaint relating to harassment or bullying, and which is made in good faith, is not subjected to any retaliation or detriment as a consequence of the complaint being made, whether or not the complaint is upheld. Anyone found to have retaliated or victimised someone for making a complaint or assisting in good faith with an investigation under this policy will be subject to disciplinary action under Ofcom's [Disciplinary Policy](#).
- 9.17 Any colleague who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under Ofcom's [Disciplinary Policy](#).

## 10. Procedure to follow if the complainant is not satisfied with the outcome

- 10.1 If, having made a formal complaint under this Policy, the colleague is dissatisfied with the outcome, they may appeal in writing to the **Senior People Business Partner** stating their full grounds of appeal within **five working days** of the date on which the outcome was given to them.
- 10.2 On appealing, the colleague will be invited to attend an appeal meeting. This will be dealt with impartially by a manager who has had no prior involvement in the complaint. The colleague may be accompanied at the appeal meeting by a fellow work colleague or Prospect Union representative or Colleague Forum representative.
- 10.3 We will confirm our final decision in writing, usually within one week of the appeal hearing. This decision shall be final and there will be no further right of appeal.

## 11. Confidentiality and record-keeping

- 11.1 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.
- 11.2 Information about a complaint by or about a colleague may be placed on the colleague's file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

## 12. Data protection

- 12.1 Ofcom processes personal data collected during informal and formal stages of this procedure in accordance with its Data Protection Policy. Data is held securely and accessed by, and disclosed to, colleagues only for the purposes of responding to the complaints or conducting the procedure. Inappropriate access or disclosure of colleague data constitutes a data breach and should be reported in accordance with the organisation's Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with under Ofcom's Disciplinary Procedure.

## 13. Overview and review

- 13.1 The People and Transformation Director will maintain an overview of this policy to ensure that it is being applied in a fair and reasonable manner and will be responsible for reviewing the policy from time to time in the light of operational experience and the changing needs of Ofcom.

## 14. Available support

14.1 Managers and colleagues are expected to be aware of the information and support that is available to all colleagues.

- a) **People and Transformation team** - colleagues and line managers can speak to the Management Advice team for further support and guidance.
- b) **Mental Health First Aiders (MHFAs)** - Ofcom has professionally-trained [mental health first aiders](#), who can provide support for colleagues' mental health. These first aiders are dedicated to supporting anyone who would like to discuss issues relating to mental health. They do not have to be in the colleague's team, their group or even their location.
- c) **Listening Network** - the [listening network](#) offers confidential, non-judgmental peer-to-peer support for the times a colleague needs a listening ear or a friendly chat.
- d) **Employee Assistance Program (EAP)** – Ofcom has a confidential help, information and advice service which is accessible by telephone or face to face. Through this service, trained counsellors are available 24 hours a day. The service, provided by Aviva, is completely free and gives colleagues access to immediate information, solutions, and advice on a wide range of workplace and personal issues.

Colleagues can access the services in the following ways:

- **By telephone** - [REDACTED]
  - **Online** at [www.eap-carefirst.com](http://www.eap-carefirst.com) - Username: [REDACTED] and Password: [REDACTED]
  - **The wellbeing app** that they can download to their phone - [Find out how to install the app](#)
  - Full details of all the support available can be found [here](#).
- e) **AXA Wellbeing Hub** - To find out all about their membership, including health and wellbeing tools and a list of the hospitals colleagues can use with their plan.  
[www.axapphealthcare.co.uk/wellbeinghub](http://www.axapphealthcare.co.uk/wellbeinghub)  
Username: [REDACTED] and password: [REDACTED]
  - f) **Private Medical Insurance (PMI)** - Ofcom currently offers a service that gives colleagues access to prompt private medical treatment by recognised consultants, therapists, and practitioners, at a time and location they choose. It covers them for the cost of outpatient treatment or investigations, as well as in-patient treatment and accommodation received in private care, up to defined levels. This also includes tailored treatment for mental ill health with trained professionals. Find out more about all the support PMI provides on [Choices](#).
  - g) **AXA Stronger Minds pathway** – A clinical pathway to access help without the need for a GP referral. A trained counsellor or psychologist will listen attentively, and suggest a clinically appropriate treatment plan, Find out more about the stronger minds pathway on [Choices](#).

## 15. Related policies

15.1 The following family-friendly and related policies may be useful to colleague:

- a) [Disciplinary Policy](#)
- b) [Grievance Policy](#)
- c) [Whistleblowing Policy](#)

## 16. Document Control

### Version history

Version number	Version date	P&T responsible	Description of changes made
1.0	31/01/2019		Document created
1.1	27/01/2020	██████████	Review update
1.2	01/12/2020	██████████	Review update Alignment with the Disciplinary and Grievance Policies
1.3	31/03/2022	██████████	Reviewed and updated the links

## 17. Appendix 1 – Further Examples of Harassment

- 17.1 Harassment relating to a person's protected characteristic(s) may include (but is not limited to) these examples where they are related to a person's protected characteristic:
- a) unwanted physical conduct or "horseplay", including touching, standing too close, pinching, pushing, grabbing, brushing past someone, and more serious forms of physical or sexual assault;
  - b) continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
  - c) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
  - d) sending or displaying material that is pornographic or that some people may find offensive (including emails, texts, video clips and images sent by mobile phone or posted on the Internet);
  - e) offensive or intimidating language, comments or gestures, or insensitive jokes, 'banter', or pranks;
  - f) offensive emails, instant messaging, text messages or social media content;
  - g) mocking, mimicking or belittling a person's disability, including not taking due regard for a colleague's existing workplace adjustments agreement;
  - h) racist, sexist, homophobic, bi-phobic, transphobic or ageist jokes or 'banter', or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
  - i) outing or threatening to out someone as gay, bisexual, lesbian or transgender;
  - j) action or behaviour based on assumptions and judgments about a colleague based on their sex, sexual orientation, gender reassignment, race, religion or belief, disability or age;
  - k) actions or behaviours based on assumptions that everyone is, for example, able-bodied or heterosexual etc;
  - l) spreading rumours or gossip about an individual or speculating about someone's sexual orientation;
  - m) asking a colleague intrusive questions about their private life; or
  - n) ignoring or shunning someone, for example, by deliberately excluding them from a conversation or a workplace social activity.

## 18. Appendix 2 – Further Examples of Bullying

18.1 Bullying, which is not related to a colleague's protected characteristic, may include (but is not limited to):

- a) spreading malicious rumours, or insulting someone by word or behaviour
- b) copying memos that are critical about someone to others who do not need to know
- c) ridiculing or demeaning someone – picking on them or setting them up to fail
- d) unfair treatment relating to someone's marriage or civil partnership status
- e) overbearing supervision or other misuse of power or position
- f) making threats or comments about job security without foundation
- g) deliberately undermining a competent worker by overloading and constant criticism