

WRUK LTD T/A WORKSHOP RECRUITMENT
ANTI-HARASSMENT, SEXUAL HARASSMENT AND BULLYING POLICY
Effective Date: 08 June 2026
Review Date: Annually
Policy Owner: Directors

1. POLICY STATEMENT

WRUK Ltd ("the Company") is committed to providing a safe, inclusive, professional and respectful working environment in which everyone is treated with dignity and respect.

The Company operates a zero-tolerance approach to all forms of harassment, sexual harassment, bullying, discrimination and victimisation.

We are committed to taking all reasonable steps to prevent harassment in the workplace and in any work-related environment. Any complaint of harassment will be treated seriously, investigated promptly and, where appropriate, disciplinary action will be taken up to and including dismissal.

This policy applies equally to harassment committed by employees, agency workers, temporary workers, contractors, clients, candidates, suppliers, visitors and any other third party.

2. PURPOSE

The purpose of this policy is to:

- Prevent harassment, sexual harassment and bullying.
- Ensure employees understand their rights and responsibilities.
- Provide clear reporting procedures.
- Ensure concerns are investigated fairly and confidentially.
- Protect individuals from victimisation or retaliation.
- Demonstrate the Company's commitment to meeting its legal obligations under the Equality Act 2010.

3. SCOPE

This policy applies to:

- All employees.
- Temporary workers and agency workers.
- Directors and managers.
- Contractors and consultants.
- Job applicants and candidates.
- Clients, suppliers and visitors.

The policy applies during:

- Working hours.
- Business travel.
- Client visits.
- Recruitment activities.
- Interviews.
- Training courses.
- Company events and social functions.
- Online meetings.
- Telephone calls.



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- Emails, messaging platforms and social media where connected to work.

4. DEFINITIONS

Harassment

Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of:

- Violating an individual's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment.

Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

A person may experience harassment even where the behaviour was not intended to cause offence.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of:

- Violating a person's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples include, but are not limited to:

- Unwanted touching or physical contact.
- Sexual comments, jokes or innuendo.
- Suggestive remarks.
- Repeated requests for dates after refusal.
- Intrusive questions about personal relationships or sex life.
- Displaying sexually explicit images or content.
- Sending inappropriate emails, texts, social media messages or other communications.
- Leering, staring or making gestures of a sexual nature.
- Making employment decisions based on acceptance or rejection of sexual conduct.

The Company recognises that sexual harassment can occur regardless of gender and can be committed by employees, managers, clients, candidates, suppliers or visitors.

Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour involving misuse of power that undermines, humiliates or injures another person.

Examples may include:

- Persistent criticism.
- Shouting or aggressive behaviour.
- Excluding individuals from meetings or activities.
- Unreasonable workloads.
- Public humiliation.



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- Deliberately undermining an individual's work.
- Legitimate management actions, performance management or disciplinary procedures conducted appropriately do not constitute bullying.

5. EMPLOYER RESPONSIBILITIES

The Company will:

- Take all reasonable steps to prevent harassment.
- Promote a respectful workplace culture.
- Provide appropriate training.
- Investigate complaints promptly.
- Take appropriate disciplinary action where necessary.
- Protect employees from victimisation.
- Monitor workplace risks relating to harassment.
- Review this policy regularly.

6. MANAGER RESPONSIBILITIES

Managers and Directors have a particular responsibility to:

- Lead by example.
- Promote respectful behaviour.
- Challenge inappropriate conduct.
- Act promptly on concerns.
- Support employees who raise complaints.
- Escalate incidents immediately.
- Complete relevant training.

Managers who fail to act appropriately may themselves be subject to disciplinary action.

7. EMPLOYEE RESPONSIBILITIES

All employees are expected to:

- Treat colleagues and others with dignity and respect.
- Refrain from conduct that could amount to harassment or bullying.
- Report concerns promptly.
- Cooperate with investigations.
- Promote a positive working environment.

8. THIRD-PARTY HARASSMENT

The Company recognises that employees may encounter harassment from third parties including:

- Clients.
- Candidates.
- Temporary workers.
- Suppliers.
- Contractors.
- Visitors.

Employees who experience or witness third-party harassment should report it immediately.

Where appropriate, the Company may:



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- Raise concerns directly with the third party.
- Remove employees from situations where harassment is occurring.
- Restrict communication channels.
- Exclude individuals from Company premises.
- Terminate commercial relationships where necessary.

The Company will take all reasonable steps to protect employees from third-party harassment.

9. REPORTING CONCERNS

Any employee who experiences, witnesses or becomes aware of harassment should report the matter as soon as possible.

Concerns may be raised through:

- A line manager.
- Any Director.
- HR (where applicable).
- Another senior manager where appropriate.

Employees are encouraged to report concerns even where they are uncertain whether behaviour constitutes harassment.

No employee will be criticised for raising a genuine concern in good faith.

10. INFORMAL RESOLUTION

Where appropriate, concerns may be addressed informally.

Examples include:

- Asking the individual to stop the behaviour.
- Requesting management intervention.
- Facilitated discussions.

Employees will never be required to confront an alleged harasser if they do not wish to do so.

Informal resolution may not be appropriate in serious cases.

11. FORMAL INVESTIGATION

Where a formal complaint is made, the Company will:

- Acknowledge the complaint promptly.
- Normally commence an investigation within five working days.
- Appoint an appropriate investigator.
- Gather relevant evidence.
- Interview relevant parties.
- Maintain confidentiality wherever reasonably possible.
- Reach conclusions based on available evidence.

Employees will be kept informed throughout the process.

All parties are expected to cooperate fully.

12. CONFIDENTIALITY

All complaints and investigations will be handled sensitively and confidentially.

Information will only be shared where necessary to investigate and resolve concerns.

Breach of confidentiality may result in disciplinary action.



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13. VICTIMISATION

The Company prohibits victimisation.

No employee will suffer any detriment because they have:

- Made a complaint.
- Supported a complaint.
- Participated in an investigation.
- Raised concerns in good faith.

Victimisation may constitute gross misconduct.

14. MALICIOUS OR FALSE ALLEGATIONS

Complaints made in good faith will never result in disciplinary action simply because an allegation cannot be substantiated.

However, deliberately false, malicious or knowingly misleading allegations may result in disciplinary action.

15. DISCIPLINARY ACTION

Where an investigation finds evidence of harassment, sexual harassment, bullying or victimisation, the Company may take disciplinary action up to and including dismissal.

Where third parties are involved, appropriate corrective action will be taken.

16. RISK ASSESSMENT AND PREVENTION

The Company will periodically assess workplace risks relating to harassment.

Areas considered may include:

- Lone working.
- Client visits.
- Candidate interviews.
- Temporary worker placements.
- Social events.
- Online communication platforms.
- Recruitment activities.

Appropriate preventative measures will be implemented where risks are identified.

17. RECORD KEEPING

The Company will maintain appropriate records relating to:

- Complaints.
- Investigations.
- Outcomes.
- Training.
- Preventative measures.

Records will be retained in accordance with data protection requirements.

18. REVIEW OF POLICY

This policy will be reviewed annually, or sooner if required due to:

- Legislative changes.
- Guidance from regulatory bodies.
- Workplace developments.



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- Lessons learned from complaints or investigations.

EMPLOYEE ACKNOWLEDGEMENT

I confirm that I have read and understood the Company's Anti-Harassment, Sexual Harassment and Bullying Policy and agree to comply with its requirements.

Employee Name: _____

Signature: _____

Date: _____



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