



## Red Lion House Charity

Charity Number; 1176422

### Working Environment Policy

#### **Purpose**

Red Lion House Charity is committed to providing a safe, respectful and supportive working environment for everyone involved with the charity, including employees, volunteers, trustees and contractors.

This policy sets out:

1. Our approach to preventing bullying and harassment
2. How concerns can be raised safely through whistleblowing

#### **1. Bullying and Harassment**

##### **Statement of Commitment**

Red Lion House operates a zero-tolerance approach to bullying, harassment, intimidation or victimisation of any kind. Everyone has the right to be treated with dignity, fairness and respect.

##### **What We Mean by Bullying and Harassment**

Harassment is unwanted behaviour that causes offence, humiliation, distress or disadvantage. Bullying is repeated or persistent behaviour that is intimidating, abusive, insulting or malicious.

This may include (but is not limited to):

- aggressive or threatening behaviour
- shouting, ridicule or humiliation
- offensive language, jokes or "banter"
- exclusion or isolation
- misuse of power or setting someone up to fail
- inappropriate use of emails, messaging or social media

It is the impact of the behaviour, not the intention, that determines whether bullying or harassment has occurred.

##### **Responsibilities**

Everyone is responsible for their own behaviour. Bullying or harassment must not be ignored. Anyone who witnesses inappropriate behaviour is encouraged to report it.

##### **Raising a Concern**

Concerns should be raised informally where possible, usually with the Safeguarding Officer. If informal resolution is not appropriate or does not resolve the issue, a formal complaint may be made. All complaints will be taken seriously and investigated promptly. No one will suffer detriment for raising a concern in good faith.

##### **Confidentiality**

All complaints will be handled sensitively and confidentially. Information will only be shared where necessary to investigate the matter properly.

## 2. Whistleblowing (Raising Concerns in the Public Interest)

### Purpose

This policy enables staff and volunteers to raise serious concerns safely and responsibly, without fear of reprisal.

### When This Policy Applies

Whistleblowing is appropriate where someone reasonably believes there is:

- fraud or financial misconduct
- criminal activity
- failure to comply with legal obligations
- risks to health, safety or the environment
- unethical or improper behaviour
- attempts to conceal any of the above

This policy is not intended to replace grievance, disciplinary or complaints procedures.

### Safeguards

#### Protection

Anyone raising a concern in good faith will be protected from victimisation or disadvantage.

#### Confidentiality

Concerns will be handled sensitively. Identities will be protected wherever possible.

#### Anonymous Concerns

Concerns may be raised anonymously, but this may limit investigation.

#### False or Malicious Allegations

No action will be taken where concerns are raised honestly but not upheld. Malicious or deliberately false allegations may result in action being taken.

### Related Policies

- Governance Policy
- Safer Recruitment Policy
- Safeguarding Policy

Agreed by the Red Lion House Charity

Date January 2026

Review Date January 2029

Signed 

## **APPENDIX 1**

Template letters to assist the procedure are available in the ACAS Handbook.

<https://uk.employeradvice.org/helpline/acas-code>

### **PROCEDURE**

#### **1. Informal Resolution**

- 1.1 Very often people are not aware that their behaviour is unwelcome or misunderstood and an informal discussion can lead to greater understanding and agreement that the behaviour will cease.
- 1.2 Complainants are therefore encouraged to try, if they feel able to do so, to resolve the problem informally by making it clear to the alleged harasser that his/her actions are unwanted and should not be repeated. This may be done verbally or in writing in which case the complainant should keep a copy of the documentation and, where possible, the times and dates of incidents should be recorded.
- 1.3 If the complainant feels unable to approach the alleged harasser, a Trustee could be asked to speak to the alleged harasser on the complainant's behalf. A note should be made of the action taken.
- 1.4 An individual who is made aware that their behaviour is unacceptable should:-
  - Listen carefully to the complaints and the particular concerns raised;
  - Respect the other person's point of view: everyone has a right to work in an environment free from harassment/intimidation;
  - Understand and acknowledge that it is the other person's reaction/perception to another's behaviour that is important
  - Agree the aspects of behaviour that will change;
  - Review their general conduct/behaviour at work and with workplace colleagues.

#### **2. Formal Resolution**

- 2.1 If the alleged harassment continues, the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally with the Trustees.
- 2.2 When dealing with a complaint of harassment under the Formal Resolution Procedure, the relevant person should:
  - a Take full details of the incidents in writing from the complainant
  - b Take full details from any witnesses/other complainants who come forward and may have witnessed the alleged behaviour
  - c Inform the alleged harasser of the complaints against him/her, advise the alleged harasser to seek representation and invite him/her to a meeting in order that they can comment on the allegations against them.

- d Keep all parties informed of expected timescales.
- e Inform all parties in writing of the outcome and any action that may be required.
- 2.4 If the allegations and the working situation warrant it, the alleged harasser may be suspended during the investigation.
- 2.5 Should there be a case to answer against the alleged harasser, the Trustee who has dealt with the complaint will communicate this to an impartial Trustee who will conduct a separate disciplinary investigation. A disciplinary procedure for misconduct/gross misconduct should then be followed. However, the following points should be taken into account:-
- The complainant will normally be required to attend the disciplinary hearing as a witness, unless there are exceptional circumstances which prevent them from doing so;
  - If the complainant is required to attend, they are entitled to be accompanied by another person and have any questions directed through that person.
- 2.6 If the complaint is upheld at the disciplinary stage, there are a number of possible outcomes for the harasser, depending on the evidence presented and the circumstances. These could include, but are not limited to:-
- Dismissal
  - A formal warning
  - A recommendation of redeployment of the harasser, either on a temporary or a permanent basis. This will not be on any less favourable terms and conditions of employment.
  - Making arrangements for both parties to work as separately as possible within the same workplace.
- 2.7 In addition to the above, the harasser may be required to attend any training courses as deemed necessary by the Charity.
- 2.8 With any allegation, the need for a thorough and objective investigation is paramount. Consequently, if through the course of the investigation evidence demonstrates that the allegation has been made frivolously, maliciously, or for personal gain, then the individual making the complaint will be subject to action.

## Appeals

Appeals against decisions taken under the Working Environment Policy and Procedures will be referred to an external adviser.

## Records

Where the complaint is informal and resolved at this stage, no record will be kept on personal files.

Following formal investigation, where the complaint is not substantiated, no records will be retained.

Where a complaint is substantiated or partially substantiated but does not proceed to disciplinary, a letter confirming the outcome will be retained on the personal file and supporting documentation retained in a separate file for a period of 12 months.

## Appendix 2

### Procedures for Making a Disclosure

Complaints of malpractice will normally be investigated by the Designated Investigating Officer (Mrs D Florence-Jukes, Chair of Trustees).

Where the complaint concerns, or is in any way related to, the actions of the Designated Investigating Officer, or where a conflict of interest may arise, the matter must be referred to the Board of Trustees. The Board will nominate an alternative Trustee or, where appropriate, appoint an independent external investigator.

In such cases, the Chair of Trustees will take no part in the investigation or any related decision-making.

If there is evidence of criminal activity then the investigating officer should inform the police. The Charity will ensure that any internal investigation does not hinder a formal police investigation.

### Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

## Investigating Procedure

The investigating officer should follow these steps:

- \* Full details and clarifications of the complaint should be obtained.
  - \* The investigating officer should inform the individual against whom the complaint is made as soon as is practically possible. The individual will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
  - \* The investigating officer should consider the involvement of the Charity auditors and the Police at this stage and should consult with the Chairman (if appropriate) or the Board of Trustees.
  - \* The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
  - \* A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to Chairman (if appropriate.) or the Board of Trustees.
  - \* The Chairman or Board of Trustees will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Charity procedures.
  - \* The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
  - \* If appropriate, a copy of the outcomes will be passed to the Charity Auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Board of Trustees.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Charity recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.