



Anti-Bullying and Anti-Harassment Policy

Document Version 1.0

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Approved by:	Directors
Last Approved Date:	February 2025
Next Review Date:	February 2026

Version Control

Version No.	Revision Date	Description of Changes and Reason	Change Author(s)	Approved by	Date Approved
1.0	01/02/25	Creation , replacing old policy.	Mark Cornish	Board	25/02/2025

1. DEFINITIONS

Word / Term	Definition
T AFC, us, our, or we etc.	Means Tonbridge Angels Football Club Limited, a Community Benefit Society, registered with registered number IPO 32445
Our People	All directors, officials, staff, volunteers, management, players, or contractors as applicable, and working for or engaged by T AFC.

2. PURPOSE AND SCOPE

This policy sets out T AFC's approach to the risk of harassment or bullying within the club and its activities. It addresses the risk of bullying and harassment by Our People and also by third parties such as customers, suppliers or visitors to our premises. It is intended as a guide on what amounts to bullying and harassment and how the company should approach issues surrounding this. It should be read and considered in conjunction with and in the context of T AFC's Diversity, Equity and Inclusion Policy.

3. OUR COMMITMENT

T AFC commits to:

1. Creating and maintaining an environment at the club that is free of bullying and harassment of any kind.
2. Taking any complaints of bullying and harassment by Our People, customers, suppliers, visitors, the public and any others in the course of the club's activities seriously.

4. WHAT IS HARASSMENT?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

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, colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation or gender reassignment. However, it is important to understand that harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, for example:

- i. unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- ii. unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- iii. offensive e-mails, text messages or social media content;

- iv. mocking, mimicking or belittling a person's characteristics or disability.

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.

Harassment may also be unintentional, in as much as the perpetrator does not appreciate or understand that they are behaving in a harassing manner.

5. WHAT IS BULLYING?

Bullying is offensive, intimidating, malicious or insulting behaviour, often 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 and can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- i. Physical or psychological threats
- ii. Overbearing and intimidating levels of supervision
- iii. Inappropriate derogatory remarks about someone's performance

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

6. WHAT TO DO IF YOU FEEL YOU ARE BEING HARASSED OR BULLIED

If a person feels that they are being harassed or bullied, in connection with their activities with TAFC they should consider whether they feel able to raise the problem informally with the person responsible. They should explain clearly to them that their behaviour is not welcome or makes them uncomfortable. If this is too difficult or embarrassing, the person should speak to their line manager or a director, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, an employee should raise the matter formally under our Grievance Procedure. For non-employees, a person should raise their concerns using procedures outlined in our Complaints Policy.

TAFC aims to investigate complaints in a timely, sensitive, and confidential manner. Investigations will be conducted by someone with appropriate experience and no prior involvement in the circumstances of the complaint, where possible. 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. We will consider whether any steps are necessary to manage any ongoing relationship between the complainant and the person accused during the investigation.

Once the investigation is complete, we will inform the complainant of our decision. If we consider that the a person has been harassed or bullied by another person, the matter will be dealt with as a disciplinary matter, as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not a complaint is upheld, we will consider how best to manage any ongoing working relationships between the persons concerned.

7. PROTECTION AND SUPPORT FOR THOSE INVOLVED

People who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action.

8. INVESTIGATION PROCEDURES

All reported concerns will be investigated promptly and thoroughly.

For employees, acts of bullying and harassment will be treated as misconduct under the TAFC's grievance and disciplinary procedures, and appropriate action will be taken. Complaints could amount to gross misconduct and lead to dismissal. Further, some forms of harassment may amount to both unlawful harassment and a criminal matter. This Policy does not form part of employee's contractual arrangements with TAFC and we may amend it at any time.

Where the alleged harasser or bully is not an employee, TAFC will appoint an appropriate person to act as investigator and investigate concerns. That person will oversee an investigation and ensure appropriate action is taken. An investigation will generally follow the following steps.

8.1 Acknowledgment of Complaint

Upon receipt of a complaint, TAFC will acknowledge its receipt within five working days. The complainant should be informed of the next steps and the estimated timeframe for the investigation.

8.2 Initial Assessment

The investigator will conduct an initial assessment to determine the validity and seriousness of the complaint. This may involve a preliminary review of the facts and circumstances surrounding the concern.

8.3 Investigation Process

The investigation should be conducted promptly, thoroughly, and fairly. The investigator will:

- Gather and review relevant documents, records, and other evidence.
- Interview witnesses and individuals involved.
- Maintain confidentiality in line with section 9 below.
- Document all findings, conclusions, and actions taken.

8.5 Interim Measures

If necessary, interim measures may be taken to mitigate any immediate risks or prevent further risk of harassment or bullying. This may include temporarily suspending individuals involved, securing relevant documents, or implementing some other forms of additional controls.

8.6 Reporting Findings

Upon completion of the investigation, the investigator will prepare a report outlining their findings, conclusions, and recommended actions. The report will be submitted to senior management and the board of directors as appropriate.

8.7 Communication with the Complainant

The complainant will be kept informed of the progress and outcome of the investigation, subject to legal and confidentiality considerations. The complainant will be notified of any actions taken as a result of the investigation.

8.8 Follow-up and Remediation

If the investigation identifies bullying or harassment, TAFC will take appropriate corrective and remedial actions. This may include disciplinary action, process improvements, or other measures to prevent recurrence.

9. CONFIDENTIALITY

All allegations of bullying and harassment reports will be treated confidentially. The identity of the complainants will be protected as far as possible, unless disclosure is required by law. However, it

should noted that an alleged harasser or bully is likely to have to know the identity of the complainant in order to allow TAFC conduct an appropriate and fair investigation.

10. ROLES AND RESPONSIBILITIES

All Our People are expected to know and understand the content of this Policy and abide by and promote the rules and principles it contains.

This Policy is fully supported by senior management. The Directors and senior management are primarily responsible for designing, implementing, overseeing, and controlling the systems, controls, and arrangements in place in relation to this Policy. The Policy is controlled by the Directors, and subject to review and amendment by them from time to time.

11. RELATED POLICIES

For further information about:

- Diversity, Equity and Inclusion, please see our Diversity, Equity and Inclusion, Policy.
- Grievances see our Grievance Policy.
- Disciplinary procedures see our Disciplinary Procedure (and associated policies).

12. RECORD KEEPING

All records related to any investigation and reports, and the outcome of complaints will be securely maintained by TAFC for an appropriate period, in compliance with legal and regulatory requirements.

For employees, information about complaints may be placed on personnel files, 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.