

HARASSMENT POLICY

(THIRD PARTY)

NOVEMBER 2024

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INTRODUCTION

The Duncan & Toplis Group works hard to maintain and develop an inclusive and respectful environment. We are a workplace where every individual must feel safe, respected, and valued, with a zero-tolerance approach to behaviour that undermines the dignity and well-being of our team.

Whether it's subtle discrimination, overt harassment, malicious bullying, or any form of victimisation, we stand resolute in our stance against it. This Harassment Policy is not about punitive measures; but fostering our culture of respect, empathy, and inclusivity. By actively addressing and eliminating instances of bullying or harassment, we continue to cultivate a workplace where talents can thrive, and all team members can contribute their best.

POLICY PURPOSE

This policy demonstrates our commitment to addressing and preventing harassment involving third parties. This includes clients, vendors, contractors, and other external stakeholders who interact with the Duncan & Toplis Group.

This policy outlines how we recognise harassment and how to report incidents and explains how we investigate claims and protect victims. This policy applies equally to any third party who may wish to make a complaint against one of our team members. Any complaint will be taken very seriously, and any claims of this nature will be fully investigated.

SCOPE

This policy applies to:

- Harassment by or against third parties (this includes clients, vendors, contractors, or visitors) involving team members.
- Harassment among third parties occurring on our premises, during company sponsored events, or while engaging in business with the company.

WHAT IS HARASSMENT?

Harassment includes unwelcome conduct based on characteristics such as race, gender, age, religion, disability, sexual orientation, or any other protected status.

Examples include, but are not limited to:

- Verbal abuse or offensive comments.
- Unwanted physical contact or advances.
- Threatening behaviour or intimidation.
- Displaying offensive materials.
- Conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating; hostile; degrading; humiliating or offensive environment; and
- Less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

WHAT IS SEXUAL HARASSMENT?

Sexual harassment can occur in many forms. While this is not an exhaustive list, examples include:

- Physical conduct of a sexual nature, unwelcome physical contact or intimidation.
- Persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions.
- Showing or sending offensive or pornographic material by any means (e.g. by text video clip, email or by posting on the internet or social media).
- Unwelcome sexual advances, propositions, suggestive remarks; or gender related insults.
- Offensive comments about appearance or dress, innuendo or lewd comments.
- Leering, whistling or making sexually suggestive gestures; and
- Gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

The most extreme form of sexual harassment is sexual assault. This is a serious crime and the Duncan & Toplis Group will support team members who want to press charges against offenders.

OUR APPROACH

All team members and third parties are encouraged to report harassment promptly.

Reports can be made to:

- Client managers, directors or line managers.
- The Duncan & Toplis Group people team: people@duncantoplis.co.uk
- Should we receive a complaint involving any form of harassment of our team members, we will;
 - Acknowledge receipt of the complaint
 - Ensure that all reports are handled with discretion to protect the privacy of those involved, where possible.
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 - Ask for as many details and information as possible from the person or people making the complaint.
 - Keep copies of the report with dates, times and details of incidents and any possible evidence in a confidential file.
 - Launch a full investigation, including meeting with the alleged harasser to understand the circumstances which may have led to the complaint being made.
 - Inform the team member or person making the complaint of our company's procedures and request a meeting to enable us to ask further questions in light of any information we have gathered from the alleged bully/harasser and/or witnesses.
 - Consider all the evidence in full and make a decision; and inform the team member/person making the complaint of our decision.
 - Ensure appropriate actions, including disciplinary measures or termination of business relationships, will be taken if harassment is confirmed
 - Use every effort to complete an investigation into bullying or harassment as quickly as possible.

The Duncan & Toplis Group reserves the right to immediately cease business with any third party suspected of behaving in an inappropriate manner towards our team member(s).

RESPONSIBILITIES

TEAM MEMBERS

- Maintain professionalism and report any harassment involving third parties.
- Support colleagues in reporting and ensure a harassment-free environment.

THIRD PARTIES

- Comply with the Duncan & Toplis standards of conduct and cooperate during investigations.

SENSITIVITY AND CONFIDENTIALITY

Anyone involved with an informal or formal complaint about bullying or harassment; including witnesses and third parties, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.

RECORD KEEPING

All personal data collected in relation to bullying or harassment complaints will be processed in accordance with our GDPR policy.

Data collected in relation to the investigation of bullying or harassment complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints and conducting an investigation.

POLICY MONITORING AND REVIEW

The Chief People Officer has overall responsibility for ensuring that this policy is complied with and that annual audits are undertaken to ensure compliance.

If you do not understand the implications of this policy or how it may apply to you, please contact the Duncan & Toplis Group people team: people@duncantoplis.co.uk.

POLICY DATE AND VERSION NUMBER

This policy is dated: November 2024

Version number: 1

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