

# Prevention of Bullying and Harassment Policy

FASD HUB South West / FASD Informed UK™

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|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
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| Policy lead               | Bullying and Harassment Policy Lead, working with the Designated Safeguarding Lead                                                    |
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# 1. Policy statement

FASD HUB South West, trading as FASD Informed UK™, is committed to a safe, respectful, FASD-informed and inclusive environment in which employees, workers, volunteers, directors, contractors, participants, parents, carers and visitors are treated with dignity. Bullying, harassment, victimisation, discrimination, intimidation, retaliation and abuse of power are not accepted. Every concern will be taken seriously, assessed promptly and handled fairly, confidentially and proportionately.

## 2. Purpose and scope

This policy applies to directors, employees, workers, volunteers, students, agency and sessional workers, contractors, consultants and anyone acting for or engaging with the organisation. It covers conduct at organisational premises, home and remote work, online platforms, training, travel, outreach, social events, residential, indoor and outdoor activities, work-related communications and conduct outside working hours where it affects safety, dignity, reputation or working relationships. Concerns involving children or adults at risk will also be handled under the Safeguarding Policy.

## 3. Principles

- Prevention, early action and respectful resolution are prioritised.
- Impact, context, power, frequency and the perspective of the person affected are considered; lack of intent does not remove responsibility.
- No person will be blamed, disadvantaged or excluded for raising a concern, supporting another person or participating in an investigation.
- Fairness applies to the reporting person, witnesses and the person complained about.
- Reasonable adjustments and accessible communication will be offered at every stage.
- Confidentiality is respected but cannot be absolute where information must be shared to investigate, safeguard, prevent harm or meet a legal duty.
- Knowingly false or malicious allegations may be addressed, but a complaint is not malicious merely because it is not upheld.

## 4. Definitions and examples

**Bullying** is unwanted behaviour from a person or group that is offensive, intimidating, malicious or insulting, or an abuse or misuse of power that undermines, humiliates or causes harm. It may be repeated or a serious one-off incident and can be overt, subtle, direct or indirect.

**Harassment** under the Equality Act 2010 is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is unwanted conduct of a sexual nature with that purpose or effect. The law also protects against less favourable treatment because a person submitted to or rejected sexual harassment or harassment related to sex or gender reassignment. **Victimisation** is detriment because a

person has done, intends to do, or is believed to have done a protected act connected with discrimination or harassment.

- Threats, shouting, humiliation, ridicule, hostile gestures or unwanted physical contact.
- Offensive remarks, mimicry, jokes, banter, images, gossip or stereotyping.
- Exclusion from information, meetings, opportunities or social contact without a legitimate reason.
- Repeatedly undermining work, withholding necessary instructions, moving expectations without explanation, setting someone up to fail or imposing unreasonable deadlines or workloads.
- Cyberbullying through email, messaging, social media, recordings, images or online meetings.
- Harassment by association or perception, or conduct witnessed by another person that creates a hostile environment.
- Retaliation, labelling someone a troublemaker, reducing opportunities or threatening consequences because a concern was raised.

Reasonable, proportionate and respectful management action, safeguarding intervention, feedback, allocation of work or performance support is not bullying merely because it is unwelcome. It may become bullying or discrimination if it is conducted unfairly, humiliatingly, inconsistently, without adequate support or adjustments, or as an abuse of power.

## 5. FASD-informed and neuroinclusive practice

FASD and other neurodevelopmental differences may affect processing speed, memory, executive functioning, sensory regulation, communication, consistency and responses under stress. No-one will be ridiculed, punished or labelled because they need repetition, concrete language, additional processing time, visual prompts, regulation breaks, help with planning or another adjustment. Behaviour will be considered in context without excusing harm.

Communication concerns will be clarified before intent is assumed. Staff and volunteers will use respectful, non-shaming language and focus on observable conduct, impact and support needs rather than labels such as difficult, manipulative, attention-seeking, unreliable or non-compliant.

## 6. Volunteers, lived experience and wellbeing

Volunteers, including parents, carers and people with FASD, disability, neurodevelopmental differences or relevant lived experience, are valued members of the team. Lived experience will not be treated as an unlimited resource or a requirement to disclose personal history. The organisation will act to prevent compassion fatigue, secondary traumatic stress, overload and burnout through realistic workloads, clear role boundaries, reflective supervision, debriefing, planned breaks, access to a named support contact and opportunities to pause, reduce or change duties safely.

Support may include predictable duties, written or visual instructions, one task at a time, extra processing time, flexible or shorter shifts, sensory breaks, paired or remote working, limits on traumatic material, temporary reassignment or phased return. Fatigue, burnout, disability-related communication, memory differences, slower processing, shutdown or distress will not

automatically be treated as misconduct or evidence that a person is unsuitable. Before formal action, the organisation will consider workload, supervision, trauma exposure, communication barriers and unmet adjustments, while acting promptly where there is an immediate risk. A request for support or an adjustment must not trigger ridicule, exclusion, retaliation or loss of valued status.

## 7. Responsibilities

As a Community Interest Company, accountability rests with the directors. They approve this policy, ensure proportionate resources, review serious or systemic concerns and appoint a Bullying and Harassment Policy Lead. Managers and event leads model respectful conduct, assess risks, act on concerns, maintain confidentiality, arrange adjustments and prevent retaliation. Everyone must treat others respectfully, cooperate with reasonable enquiries, report serious concerns and avoid behaviour that could reasonably cause harm. Bystanders are encouraged to challenge safely, support the affected person and report what they witnessed.

## 8. Prevention and risk assessment

The organisation will assess and reduce foreseeable risks, including isolated work, night or outdoor events, remote communication, social media, alcohol at work-related events, power imbalances, one-to-one contact, public-facing roles, emotionally demanding advocacy, crisis work and contact with third parties. Preventive measures include codes of conduct, induction, accessible reporting routes, leadership modelling, supervision, workload review, risk-based training, clear online standards and prompt action on warning signs. The organisation will take the legally required reasonable steps to prevent sexual harassment and will prepare for any stronger statutory duty coming into force after this policy's approval date.

## 9. Raising a concern

A concern may be raised verbally or in writing with a manager, the Policy Lead, a director or the Designated Safeguarding Lead. An alternative contact must be available where the concern involves the usual recipient or a director. A person may be accompanied by a colleague, representative, advocate or trusted supporter. Anonymous concerns will be considered, although anonymity may limit investigation. No person is required to confront the alleged perpetrator. Informal resolution may be considered only where safe, voluntary and appropriate; serious, repeated, discriminatory, sexual, retaliatory or safeguarding-related conduct will normally require formal action.

Immediate support may include a safe contact, communication adjustment, changed reporting line, temporary separation, remote working, altered duties, leave, welfare support or safeguarding action. Any temporary change will be regularly reviewed and will not presume guilt or disadvantage the reporting person. Immediate danger, violence, stalking, hate crime or another suspected criminal offence should be reported to the police or emergency services as appropriate.

## 9.1 Informal resolution pathway

Informal resolution may proceed only after the Policy Lead has separately checked with the reporting person and the person whose conduct is raised that participation is voluntary, informed and safe. The Policy Lead will record the concern, the reasons informal action is suitable, any safeguarding or power-imbalance assessment, agreed communication adjustments, the facilitator, the issues to be addressed, confidentiality limits, the expected outcome and a review date. Options may include supported clarification, agreed boundaries, a written communication plan, an apology, coaching, facilitated discussion or mediation by a suitably impartial person. No person will be required to meet, communicate directly, accept an apology or waive the right to formal action. Either person may pause or withdraw at any time. The Policy Lead will document whether the agreement was completed and whether risk or recurrence remains. The matter will move to the formal procedure where informal action is declined, unsafe, unsuccessful, breached, or reveals serious, repeated, discriminatory, sexual, retaliatory or safeguarding-related conduct.

## 9.2 Timescales for handling concerns

Unless immediate safeguarding or emergency action requires a faster response, the organisation will aim to acknowledge a concern within two working days, complete an initial safety and conflict-of-interest assessment within five working days, and offer the reporting person an accessible meeting within ten working days. Where formal investigation is required, an investigator and written scope should normally be confirmed within ten working days of that decision. The organisation will aim to complete a straightforward investigation and communicate the outcome within thirty working days; complex cases may take longer because of safeguarding enquiries, police involvement, witness availability, reasonable adjustments or the volume of evidence. The Policy Lead will provide a progress update at least every ten working days, explain any delay, record the revised target date and keep interim protective measures under review. A request for review or appeal should normally be made within ten working days of the written outcome and acknowledged within two working days. These are target timescales rather than guarantees and will be applied flexibly where disability, trauma, neurodevelopmental needs or another reasonable adjustment affects participation.

The Policy Lead will appoint the investigator and identify a separate decision-maker wherever practicable. A complaint concerning the Policy Lead will be referred to an uninvolved director. A complaint concerning a director will be referred to another uninvolved director or an appropriately independent external person. Where no conflict-free internal decision-maker is available, the organisation will obtain independent support. The reporting person will be told who is responsible for each stage and how to challenge a conflict of interest.

## 10. Formal procedure and investigation

1. The complaint will be acknowledged promptly and the reporting person will be offered an accessible meeting to clarify the conduct, dates, people involved, impact, evidence, desired support and any immediate risk.
2. A conflict-free investigator will be appointed. Where practicable, the investigator will not make the final disciplinary or grievance decision.
3. The scope, issues, witnesses, evidence, confidentiality expectations, adjustments and indicative timescale will be recorded and communicated.

4. The person complained about will receive sufficient detail to respond fairly, subject to necessary safeguarding or legal restrictions. They may be accompanied and request adjustments.
5. Relevant evidence may include messages, emails, documents, meeting records, witness accounts, work allocation, social media, recordings lawfully obtained and patterns of behaviour.
6. Findings will be made on the balance of probabilities and will distinguish fact, allegation, opinion and unresolved uncertainty.
7. Both parties will receive an appropriate written outcome, reasons, actions and review or appeal route, while protecting confidential third-party information.

## 11. Safeguarding, confidentiality and data protection

Where a concern affects a child or adult at risk, indicates abuse, neglect, exploitation, coercion, grooming or misuse of trust, or involves a person in a position of trust, the Designated Safeguarding Lead will coordinate immediate action and statutory consultation or referral. Internal handling must not delay protection, police action or contact with the relevant safeguarding authority.

Information will be shared only with people who need it for support, investigation, decision-making, safeguarding or legal duties. Participants must not circulate allegations or evidence. Records will be accurate, factual, secure, access-controlled and retained under the Data Protection Policy and retention schedule. Prenatal alcohol information, disability, health, care status, family circumstances and other special category information will not be disclosed unless necessary, proportionate and lawful.

## 12. Outcomes, remedies and follow-up

Outcomes may include no further action, clarification, agreed boundaries, apology, facilitated discussion, mediation, coaching, training, supervision, workload or reporting-line changes, reasonable adjustments, formal warning, removal from duties, ending a volunteer arrangement or contract, dismissal, safeguarding referral or police report. Mediation or restorative work will never be compulsory and will not replace formal action where there is serious harm, discrimination, sexual harassment, retaliation, abuse of power or safeguarding risk. Actions will address risk, impact and recurrence, not only individual culpability. The reporting person and the person complained about will be offered follow-up and informed how to request a review or appeal under the relevant procedure.

## 13. Third-party harassment and public-facing work

The organisation will protect staff and volunteers, so far as reasonably practicable, from bullying or harassment by participants, family members, visitors, commissioners, partners, contractors, online users and members of the public. Reports will be acted on through risk assessment, boundaries, warnings, service adjustments, communication plans, removal from activities, contract action, safeguarding or police referral. A person will not be expected to tolerate abuse because the third party has additional needs; responses will remain FASD-informed, proportionate and focused on safety, support and prevention.

## 14. Training, monitoring and review

Induction and refresher learning will cover respectful conduct, protected characteristics, sexual harassment prevention, FASD-informed and neuroinclusive communication, reasonable adjustments, bystander action, complaint handling, confidentiality, safeguarding and retaliation. The Policy Lead will monitor themes, recurrence, time to resolution, outcomes, adjustments, workload, volunteer wellbeing, compassion-fatigue indicators, third-party incidents and completion of actions. Anonymised assurance will be reported to the directors at least annually. Monitoring will not be used to identify or stigmatise individuals. This policy will be reviewed by 1 September 2027 and sooner following a serious incident, evidence of systemic risk or a relevant legal change.

## 15. Legal framework and related guidance

- Equality Act 2010, including sections 26, 27, 40, 40A and 109.
- Worker Protection (Amendment of Equality Act 2010) Act 2023.
- Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999.
- Employment Rights Act 1996 and relevant common-law duties of care, trust and confidence.
- Protection from Harassment Act 1997 and applicable criminal law.
- Data Protection Act 2018 and UK General Data Protection Regulation.
- Acas guidance on bullying, harassment, discrimination, victimisation, complaint handling, reasonable adjustments and neurodiversity at work.
- Equality and Human Rights Commission technical guidance on sexual harassment and harassment at work.
- Health and Safety Executive guidance on work-related stress and the Management Standards.
- This policy should be read with the Safeguarding Policy, Equality, Diversity and Inclusion Policy, Code of Conduct, Grievance Procedure, Disciplinary Procedure, Whistleblowing Policy, Complaints Policy, Health and Safety Policy, Data Protection Policy and Volunteer Policy.

**Approved on behalf of FASD HUB South West, trading as FASD Informed UK™, on 7 August 2026.**

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