

R&M POLICY · PEOPLE AND ETHICS

Anti-Bullying and Harassment Policy

R&M Property Group Ltd

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1. Director's Statement

R&M Property Group Ltd is committed to creating a working environment in which every individual is treated with dignity and respect, free from bullying, harassment, and intimidation. Bullying and harassment are destructive behaviours that damage individuals, undermine teams, erode productivity, and have no place in a professional working environment.

The construction industry faces well-documented challenges in this area. Research by the Chartered Institute of Building (CIOB), the Health and Safety Executive (HSE), and mental health charities including the Lighthouse Construction Industry Charity and Mates in Mind has consistently shown that bullying and harassment remain significant problems in construction, contributing to poor mental health, high staff turnover, skills shortages, and an industry culture that deters people from entering or remaining in the sector.

R&M is determined to be part of the solution. We will not tolerate bullying or harassment of any kind - whether it occurs on our construction sites, in our offices, at work-related events, or through digital communications. This applies to everyone who works on or visits our projects, regardless of their role, seniority, or employer.

Thom McKenna, Director, R&M Property Group Ltd

2. Legal Framework

2.1 Equality Act 2010 - Harassment

Section 26 of the Equality Act 2010 defines harassment as unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person. The relevant protected characteristics for harassment claims are age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation. Harassment related to any of these characteristics is unlawful.

Sexual harassment is addressed separately under R&M's Prevention of Sexual Harassment Policy (RM-POL-PSH-001), which sets out the specific requirements of the Worker Protection (Amendment of Equality Act 2010) Act 2023. This Anti-Bullying and Harassment Policy covers all other forms of harassment and all forms of bullying.

2.2 Bullying

Bullying is not defined as a specific legal offence in UK legislation, but it can give rise to legal claims under several routes. The Health and Safety at Work etc. Act 1974 places a duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees - this includes their psychological health and welfare. The HSE's Management Standards for work-related stress identify relationships at work, including bullying and harassment, as one of the six primary stressors. A pattern of bullying behaviour may also constitute harassment under the Protection from Harassment Act 1997, which creates both criminal offences and civil remedies. Additionally, an employee who resigns because of bullying may claim constructive unfair dismissal under the Employment Rights Act 1996.

2.3 Employer's Duty of Care

Employers owe a common law duty of care to their employees and a statutory duty under the Health and Safety at Work etc. Act 1974 to protect their health, safety, and welfare. Failing to address bullying and harassment can result in civil claims for personal injury (including psychiatric injury), employment tribunal claims for harassment, discrimination, constructive dismissal, or victimisation, HSE enforcement action where bullying contributes to work-related stress, and reputational damage that affects the company's ability to recruit, retain, and win public sector work.

3. Scope

This policy applies to:

- All directors, employees, and workers of R&M Property Group Ltd
- All agency workers and labour-only subcontractor operatives on R&M projects
- All subcontractors, consultants, and professional advisors while on R&M premises or projects
- All visitors to R&M offices or construction sites

The policy applies to conduct that takes place on any R&M construction site or premises, at work-related events including training, conferences, and social events, during travel connected with work, and through any form of communication including email, text, instant messaging, social media, and telephone calls where the communication is connected with work or involves individuals who have a work relationship.

4. Definitions - What Constitutes Bullying and Harassment

4.1 Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour, and/or an abuse or misuse of power, that is intended to undermine, humiliate, denigrate, or injure the recipient. Bullying can be a single serious incident or a pattern of behaviour over time. It can occur between individuals of any seniority - it is not limited to a manager bullying a subordinate. Bullying can be carried out by a group against an individual or by an individual against another individual.

Examples of bullying behaviour include, but are not limited to:

- Shouting at, being sarcastic towards, or verbally abusing a colleague, particularly in front of others
- Persistent, unjustified criticism of a person's work or capability
- Deliberately setting a person up to fail by giving them tasks beyond their competence, impossible deadlines, or inadequate resources, and then criticising them for failing
- Deliberately excluding a person from meetings, conversations, work activities, or social events connected with work
- Spreading malicious rumours or gossip about a person
- Removing areas of responsibility from a person without justification, or deliberately blocking their progression or development
- Making threats about job security, disciplinary action, or other adverse consequences without legitimate cause

- Persistent unwelcome teasing, practical jokes, or 'banter' that the recipient finds offensive or humiliating, regardless of whether others find it amusing
- Physical intimidation, aggressive gestures, or invading someone's personal space in a threatening manner
- Overbearing supervision or micromanagement that goes beyond legitimate management oversight and is intended to intimidate or control
- Deliberately withholding information that a person needs to do their job
- Tampering with or hiding a person's tools, equipment, PPE, or personal belongings

4.2 Harassment Related to a Protected Characteristic

Harassment under the Equality Act 2010 is unwanted conduct related to a protected characteristic. It does not have to be directed at the person making the complaint - a person can be harassed by conduct that is directed at someone else or that creates a general environment that is hostile or offensive. Examples include:

- **Race and ethnicity:** Racist jokes, slurs, name-calling, or derogatory comments about a person's race, nationality, ethnic origin, skin colour, or accent. Displaying racist symbols or material. Mocking a person's cultural practices, food, dress, or religious observance
- **Disability:** Mocking or mimicking a person's disability. Making derogatory comments about a person's physical or mental health condition. Refusing to make reasonable adjustments and then criticising the person for underperformance. Using disability-related slurs or language
- **Age:** Derogatory comments about a person's age, such as 'too old to learn', 'past it', or 'just a kid'. Excluding a person from opportunities or social activities because of their age
- **Religion or belief:** Mocking or denigrating a person's religious beliefs, practices, or observance. Refusing to accommodate reasonable requests related to religious practice (such as prayer times or dietary requirements). Pressuring a person to change or abandon their beliefs
- **Sexual orientation:** Homophobic or biphobic jokes, slurs, or language. Outing or threatening to out a person's sexual orientation. Excluding a person from work activities because of their sexual orientation
- **Gender reassignment:** Transphobic language, jokes, or slurs. Deliberately misgendering a person or refusing to use their chosen name or pronouns. Invasive or inappropriate questions about a person's gender identity or transition

4.3 What Is Not Bullying or Harassment

This policy does not prevent legitimate, constructive management. The following are not bullying or harassment:

- Reasonable and constructive feedback on work performance, delivered respectfully and in private
- Setting clear expectations, targets, and deadlines as part of normal performance management
- Reasonable instructions given by managers and supervisors in the course of their duties
- Legitimate disciplinary or capability proceedings conducted fairly and in accordance with R&M's procedures
- Robust professional debate or disagreement, provided it is conducted with mutual respect
- Allocating or reallocating work for genuine operational reasons

However, the manner in which management actions are carried out matters. Even legitimate management activity becomes bullying if it is carried out in a way that is designed to humiliate, intimidate, or undermine the individual.

5. Construction Industry Context

R&M recognises that the construction industry presents specific challenges in relation to bullying and harassment:

- Site culture and banter: Construction sites have traditionally operated with a culture of robust banter. While good-natured camaraderie can build strong teams, there is a fine line between banter and bullying, and that line is defined by the impact on the recipient, not the intention of the person responsible. R&M expects all workers to understand the difference and to respect it
- Hierarchy and power dynamics: Construction projects involve clear hierarchies - from project directors and site managers through foremen and supervisors to trade operatives. These power dynamics can create conditions in which bullying goes unchallenged because the person being bullied feels unable to confront or report someone who has authority over their work, their hours, or their continued employment on site
- Subcontracted workforce: A large proportion of workers on R&M sites are employed by subcontractors. This can create divided loyalties and uncertainty about who is responsible for addressing bullying. R&M's position is clear: everyone on site is subject to R&M's behavioural standards, and R&M will act on any report of bullying regardless of who employs the individuals involved
- Transient workforce: Workers may move between sites and employers frequently. This can make it harder to build the relationships and trust necessary for reporting concerns, and can allow repeat offenders to move on before they are held accountable. R&M addresses this by recording behavioural incidents and sharing information (within data protection limits) across its projects
- Mental health impact: The CIOB's research and the work of the Lighthouse Charity and Mates in Mind have demonstrated the link between workplace bullying and poor mental health in construction. Bullying is a contributing factor to the construction industry's disproportionately high rates of stress, anxiety, depression, and suicide. R&M's Anti-Bullying and Harassment Policy operates alongside its Mental Health and Wellbeing Policy to address both the causes and the consequences
- Diversity and inclusion: As the construction industry works to become more diverse and inclusive - attracting more women, people from ethnic minority backgrounds, disabled workers, and younger workers - it is essential that the working environment is safe and welcoming for everyone. Bullying and harassment deter people from entering or remaining in the industry and undermine every diversity and inclusion initiative

6. Reporting Bullying and Harassment

R&M encourages any individual who has experienced or witnessed bullying or harassment to report it. No one should have to put up with behaviour that makes them feel unsafe, uncomfortable, or unable to do their job. Reports can be made through any of the following channels:

- **Site manager or line manager:** Any concern can be raised verbally or in writing. Where the concern relates to the conduct of the manager themselves, the report should be made to the Compliance Officer or the Director
- **Compliance Officer:** Phillip Hollingworth (Spectra Safety) - available to receive reports from any individual, whether directly employed, agency, or subcontractor
- **Director:** Thom McKenna - available for any concern, at any time
- **Mental Health First Aiders:** R&M's trained MHFAs can provide a confidential listening ear and can help an individual decide how they wish to proceed. MHFAs do not investigate complaints but can support the individual in raising the matter through the formal channels
- **Anonymous reporting:** Anonymous reports can be made in writing to the Compliance Officer. R&M will take all anonymous reports seriously and will investigate to the extent possible

6.1 Informal Resolution

In some cases, the individual may wish to try to resolve the matter informally before raising a formal complaint. This might involve speaking directly to the person whose behaviour is causing concern (if the individual feels safe and comfortable doing so), asking a manager or the Compliance Officer to have an informal word with the person, or using mediation to facilitate a constructive conversation between the parties.

Informal resolution is not appropriate in all cases - particularly where the behaviour is serious, where there is a significant power imbalance, or where the individual feels unsafe. No one is required to attempt informal resolution before making a formal report. The choice is always with the person affected.

6.2 Formal Complaints

Where informal resolution is not appropriate or has not been successful, a formal complaint can be made to the Compliance Officer or the Director. The complaint should include a description of the behaviour, when and where it occurred, any witnesses, and the impact on the individual. Written complaints are preferred as they provide a clear record, but verbal complaints will also be accepted and recorded by the person receiving them.

7. Protection from Retaliation

R&M guarantees that no individual will suffer any detriment as a result of reporting bullying or harassment in good faith, supporting someone who has made a report, acting as a witness, or cooperating with an investigation. This protection applies to all individuals on R&M projects, regardless of their employer. Any retaliation against a person who raises a concern will itself be treated as a serious disciplinary matter.

Under Section 27 of the Equality Act 2010, victimisation - subjecting a person to a detriment because they have made or supported a complaint of harassment - is unlawful and constitutes a separate legal claim.

8. Investigation and Outcomes

8.1 Investigation Process

All formal complaints of bullying and harassment are investigated promptly, thoroughly, and fairly. The investigation is conducted by the Compliance Officer or, where the seriousness or complexity of the case requires it, by an external investigator. The investigator interviews the complainant, the respondent, and any witnesses. All interviews are conducted in private and with appropriate confidentiality. Both the complainant and the respondent are entitled to be accompanied at investigation meetings by a colleague or trade union representative.

8.2 Interim Measures

Where necessary to protect the complainant or to ensure a fair investigation, R&M may put interim measures in place pending the outcome of the investigation. These may include separating the individuals on site, adjusting work assignments, or, in serious cases, suspending the respondent on full pay. Interim measures are not a finding of guilt and are taken without prejudice to the outcome of the investigation.

8.3 Outcomes for R&M Employees

Where the investigation concludes that bullying or harassment has occurred on the part of an R&M employee, the matter is dealt with under R&M's disciplinary procedure. Sanctions depend on the severity and nature of the behaviour and may include a formal warning, final written warning, mandatory training or coaching, transfer or reassignment, demotion, or summary dismissal for gross misconduct. Serious or repeated bullying and harassment, and any harassment related to a protected characteristic, may be treated as gross misconduct.

8.4 Outcomes for Subcontractor Operatives and Third Parties

Where bullying or harassment is committed by a subcontractor operative, agency worker, or other third party, R&M will require the individual to be removed from the project. The individual's employer will be notified and required to take appropriate action. Repeated or serious incidents may result in the subcontractor or agency being removed from R&M's approved supplier list.

8.5 Support

R&M recognises the impact that bullying and harassment can have on mental health and wellbeing. Support is available to the complainant throughout and after the process, including access to R&M's Employee Assistance Programme (EAP), support from trained Mental Health First Aiders, time off where needed, and any reasonable adjustments to working arrangements. Support is also available to the respondent and to witnesses, who may also be affected by the process.

9. Manager and Supervisor Responsibilities

Managers and supervisors have a particular responsibility under this policy. They set the tone for behaviour on their teams and projects, and their actions (or failure to act) have a significant influence on whether bullying is tolerated or challenged. Specifically, managers and supervisors must:

- Lead by example - treat all individuals with dignity and respect at all times
- Be alert to signs of bullying and harassment within their teams and on their projects, and take action promptly when they observe or are made aware of inappropriate behaviour
- Challenge unacceptable behaviour when they see it, even if no formal complaint has been made - this includes intervening in 'banter' that crosses the line
- Take all complaints seriously, listen without judgment, and follow the reporting and investigation procedures set out in this policy
- Not dismiss complaints as oversensitivity, personality clashes, or 'just the way construction is'
- Ensure that new starters, including subcontractor operatives, receive the behavioural expectations briefing at induction
- Monitor their own behaviour and seek feedback on their management style - firm, fair management is expected; intimidation and humiliation are not

A manager who witnesses bullying or harassment and fails to take reasonable action may themselves face disciplinary proceedings.

10. Digital and Online Bullying and Harassment

Bullying and harassment through digital channels - including WhatsApp groups, text messages, emails, social media, and online forums - is taken just as seriously as face-to-face conduct. The prevalence of WhatsApp groups in construction for site communications, team coordination, and social interaction means that digital bullying is a specific risk that R&M addresses.

The following are examples of digital bullying and harassment:

- Sending or forwarding offensive, discriminatory, or intimidating messages in work group chats
- Sharing embarrassing photos or videos of a colleague without their consent
- Posting derogatory comments about a colleague on social media
- Deliberately excluding a colleague from a work group chat where work-related information is shared
- Persistent unwanted messaging outside of working hours where it constitutes harassment
- Creating, sharing, or commenting on memes or content that targets or demeans a colleague

R&M expects all workers to apply the same standards of respect and professionalism in digital communications as they would in face-to-face interactions. If you would not say it to someone's face in front of a site manager, do not say it in a message or post it online.

11. Responsibilities

- **Thom McKenna (Director):** Overall responsibility for creating a working environment free from bullying and harassment. Approves this policy, ensures adequate resources for training and prevention, and sets the cultural tone for the organisation.
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** Responsible for receiving and investigating complaints, maintaining training records, monitoring trends, advising managers, and reviewing this policy annually.

- **Jon Scurr (Director of Operations):** Responsible for ensuring that site managers and project teams maintain appropriate behavioural standards on all projects and that the site induction includes the behavioural expectations briefing.
- **Site Managers and Supervisors:** Responsible for setting and maintaining standards on site, intervening promptly when inappropriate behaviour occurs, supporting individuals who raise concerns, and escalating matters to the Compliance Officer.
- **Louis Howard (Procurement Manager, Enabl):** Responsible for ensuring that subcontract and agency terms include behavioural standards and anti-bullying provisions.
- **Mental Health First Aiders:** Provide confidential support to individuals affected by bullying and harassment, and signpost them to the appropriate reporting and support channels.
- **All Individuals:** Every person on an R&M project has a personal responsibility to treat others with dignity and respect, not to engage in bullying or harassment, to challenge unacceptable behaviour where it is safe to do so, and to report any concerns.

12. Training

All R&M employees receive anti-bullying and harassment training as part of their induction, covering what constitutes bullying and harassment, the difference between legitimate management and bullying, the impact on individuals and teams, the reporting channels, and the company's zero-tolerance approach. This training is refreshed annually.

Site managers and supervisors receive enhanced training on recognising and responding to bullying, intervening as a bystander, conducting initial conversations with complainants, and their specific responsibilities under this policy. Training records are maintained by Phillip Hollingworth.

13. Monitoring and Review

R&M monitors the number and nature of bullying and harassment reports and uses this data to identify trends, assess the effectiveness of preventative measures, and inform the annual review of this policy. Anonymised data is included in the quarterly compliance report to the Director.

R&M may conduct periodic anonymous workforce surveys to assess whether workers feel safe from bullying and harassment and confident in the reporting process. The results of any survey will be shared with the workforce in summary form and used to drive improvement.

14. Related Policies

This policy operates alongside and should be read in conjunction with:

- R&M Prevention of Sexual Harassment Policy (RM-POL-PSH-001)
- R&M Equality and Diversity Policy
- R&M Mental Health and Wellbeing Policy
- R&M Disciplinary Procedure
- R&M Grievance Procedure
- R&M Whistleblowing Policy
- R&M Social Media and Communications Policy

15. Policy Review

This policy is reviewed annually by the Compliance Officer and approved by the Director. The next scheduled review date is June 2027. The policy will also be reviewed following any bullying or harassment incident or investigation, any change in relevant legislation or guidance, any significant change in R&M's workforce composition, or upon feedback from employees, Client Organisations, or the Framework Manager.

Approved and Signed

Name: Thom McKenna

Position: Director, R&M Property Group Ltd

Date: 24 June 2026

This policy will be published on the R&M Property Group Ltd website and available to all employees, supply chain partners, and framework clients upon request.

Please print name, sign and date below your agreement to this policy -