



Office for
Nuclear Regulation

Bullying & Harassment Policy Toolkit

Step in and step up against bullying and harassment



ONR's key priority is the safety and wellbeing of our staff

ONR's key priority is the safety and wellbeing of all staff.

Our ambition is, for all of us to work together to build a healthy culture of inclusion and excellence, ensuring we are treated and treat each other with dignity and respect.

We recognise that from time to time inappropriate behaviour in the workplace does occur, which can have a significant impact on people and lead to a poor workplace culture. We all have a responsibility to **step in and step up against bullying and harassment**. So if it does happen, we want you to have the confidence to speak up and solve any problems with the appropriate support in place, to ensure the best possible outcome is achieved.

Working together with colleagues from across the organisation, TU representatives, and the Diversity & Inclusion Group, we have revised our [Bullying & Harassment \(B&H\) policy](#) as a clear statement of our commitment that bullying and harassment will not be tolerated in ONR. The policy supports our People Strategy 2020-25 and Values, and clearly states that any allegation of bullying or harassment will be taken seriously, investigated and dealt with appropriately.

This **toolkit** provides practical steps that can be taken by all of us; as individuals, CDMs and leaders, to call out inappropriate behaviour, and create the fully inclusive and respectful culture we all deserve.

Introducing ONR's 24/7 dedicated and confidential Bullying & Harassment helpline: 0800 031 4547

We acknowledge that staff must have total confidence to enable the right support, from the right place and at the right time to address any concerns relating to bullying and harassment in our place of work. In addition to our internal support networks, ONR has sourced an external dedicated B&H helpline, which offers staff an additional layer of confidential support.



[Watch the introduction video](#)

Mark Foy

Chief Nuclear Inspector



This toolkit talks about

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Results from our last Staff Survey show

Bullying and harassment can have a significant impact on people and lead to a poor workplace culture. Everyone has a responsibility to call out inappropriate behaviour – working together we all need to *step in and step up against bullying and harassment*.

1 in 8

Said that they have been subjected to bullying and harassment

1 in 3

Said that they have witnessed bullying and harassment

1 in 6

Think that poor behaviours are dealt with in an effective manner



Addressing bullying and harassment: Why it matters

Bullying and harassment can have a highly negative impact on people and the organisation. It can damage: the individual; culture; and collective performance.



Impact on the individual:

- Mental health state
- Stress and anxiety
- Humiliation
- Loss of dignity and self-esteem
- Low morale
- Poor performance
- On edge
- Isolation
- Insomnia
- Fear
- Emotional exhaustion



Impact on the organisation:

- Diminished performance
- Increased sickness rates
- Increased absenteeism
- Increased presenteeism
- Reduced productivity
- Low staff morale
- Poor workforce culture
- Costly legal proceedings



Spotlight on bullying – what it is and how it can feel

While there is no legal or universal definition of bullying, the Advisory, Conciliation and Arbitration Service (ACAS) describe bullying as:

Behaviour from a person or group that's unwanted and makes you feel uncomfortable, including:

- Frightened ('intimidated')
- Less respected or put down ('degraded')
- You're made fun of and it makes you feel uncomfortable ('humiliated')
- Upset (insulted or 'offended')

Bullying may:

- Be a regular pattern of behaviour or a one-off incident
- Happen face-to-face, on social media, in emails or phone calls
- Happen in the workplace or at work social events
- Not always be obvious or noticed by others
- Undermine an individual or group of employees
- Be done by anyone; a manager, colleague or team member

The key point to remember is the **impact** on the **recipients** behaviour will be a weighing factor in deciding whether or not bullying has taken place; as well as, the context and nature.



Examples of bullying

Examples of bullying may include:

- Continually ignoring views and opinions without justification or a legitimate reason
- Withholding information to intentionally affect a colleague's performance
- Humiliating someone in front of others
- Insults and put downs
- Spreading malicious rumours
- Excluding someone from work, meetings or activities without justification



Is it bullying? Case examples

Bullying can take many different forms.

In some cases, what may appear to be bullying behaviour may not be. If you are unsure why you are being asked to do something, or why someone is behaving in the way they are, ask them. You will be supported to do so.

Please see **examples** of what could be considered bullying:



Lisa was blamed for mistakes in front of the entire team. She was shouted at and told to do the work again. Everyone was listening and now talking about her.

Andy emails his direct report, Sarah, blaming her for the backlog in their department. He threatens to demote her if the department doesn't meet its targets. He glares at her in the office and makes fun of her if she asks questions in meetings.

Julie often turns up late for meetings. When she enters the room her manager comments in front of others "glad you could make it" or "what time do you call this?"

Mark feels very anxious around his manager. He feels that if he makes even a slight error his manager will blow up as if he has done everything wrong.

David is off work sick. His line manager calls him at home to discuss his absence and the amount of sick leave he has had off in the past six months and wants to know when he will be back at work.



Not all behaviour that can be seen as 'negative' amounts to bullying

One example of this is Performance Management.

Managers are expected to manage and support their teams effectively. This includes giving feedback, ensuring delivery against agreed objectives, or addressing conduct or attendance concerns; and asking staff to carry out legitimate instructions.

Unless it is done inappropriately, performance management is not bullying.



For example, the following management actions do not constitute bullying:

- Setting deadlines and objectives
- Undertaking performance appraisals
- Appropriately following up on work absences
- Challenging an employee for poor behaviour
- Raising performance concerns
- Requiring an employee to do something they may not want to do which falls within the scope of their duties/responsibility
- Being assertive in giving legitimate instructions or in addressing performance



Spotlight on harassment – Equality Act 2010



The Equality Act 2010 states that it is harassment when unwanted behaviour or conduct is related to the following protected characteristics that has the purpose or effect of violating the individual's dignity, or creating an intimidating, hostile, degrading or offensive environment for the individual or others:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation



Is it harassment? Case examples

The Equality Act 2010 uses a single definition of harassment to cover the relevant protected characteristics.

Employees can complain of behaviour that they find offensive even if it is not directed at them.

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”.

The relevant protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation.

The following examples demonstrate what could be considered harassment:

Stephen has a child with a disability and his manager has agreed that he can work flexible hours to help manage his caring responsibilities. Two of his team mates resent this and talk behind his back.

A group of female workers have started to hang out in the hallway outside the main cafeteria making comments about men’s appearances as they pass by and rating them on a scale of 1 to 10. Paul is starting to skip lunch to avoid these comments.

Thomas tells his team mates that he is going to a PRIDE event to show his support. Over the next few days his colleagues start calling him names and ask him if he “has become a queer”.

Paul is disabled and is claiming harassment against his line manager after she frequently teased and humiliated him about his disability. Richard shares an office with Paul and he too is claiming harassment, even though he is not disabled, as the manager’s behaviour has also created an offensive environment for him.

What can I do if bullying or harassment happens to me?

You have the right to be treated with dignity and respect at work.

- These rights are protected by law.
- Do not be ashamed to tell people what's going on.
- Bullying and harassment is serious. So if it happens to you, you must let people know what's happening so they can help you. By sharing your experience you may discover that it's happening to other people too.



You have the right to:

- Ask the person involved why they are behaving the way they are and, if appropriate, ask them to stop
- Seek support from your colleagues and trade unions
- Have the complaint taken seriously
- Expect action to be taken, as appropriate
- Have the matter dealt with in a confidential manner
- Take formal action if you wish

The individual subject to the complaint also has rights. They have the right to:

- Respond and have their view heard
- Support from colleagues and trade unions
- Have the matter dealt with in a confidential manner
- Be provided with a summary of the complaint details
- Be supported appropriately



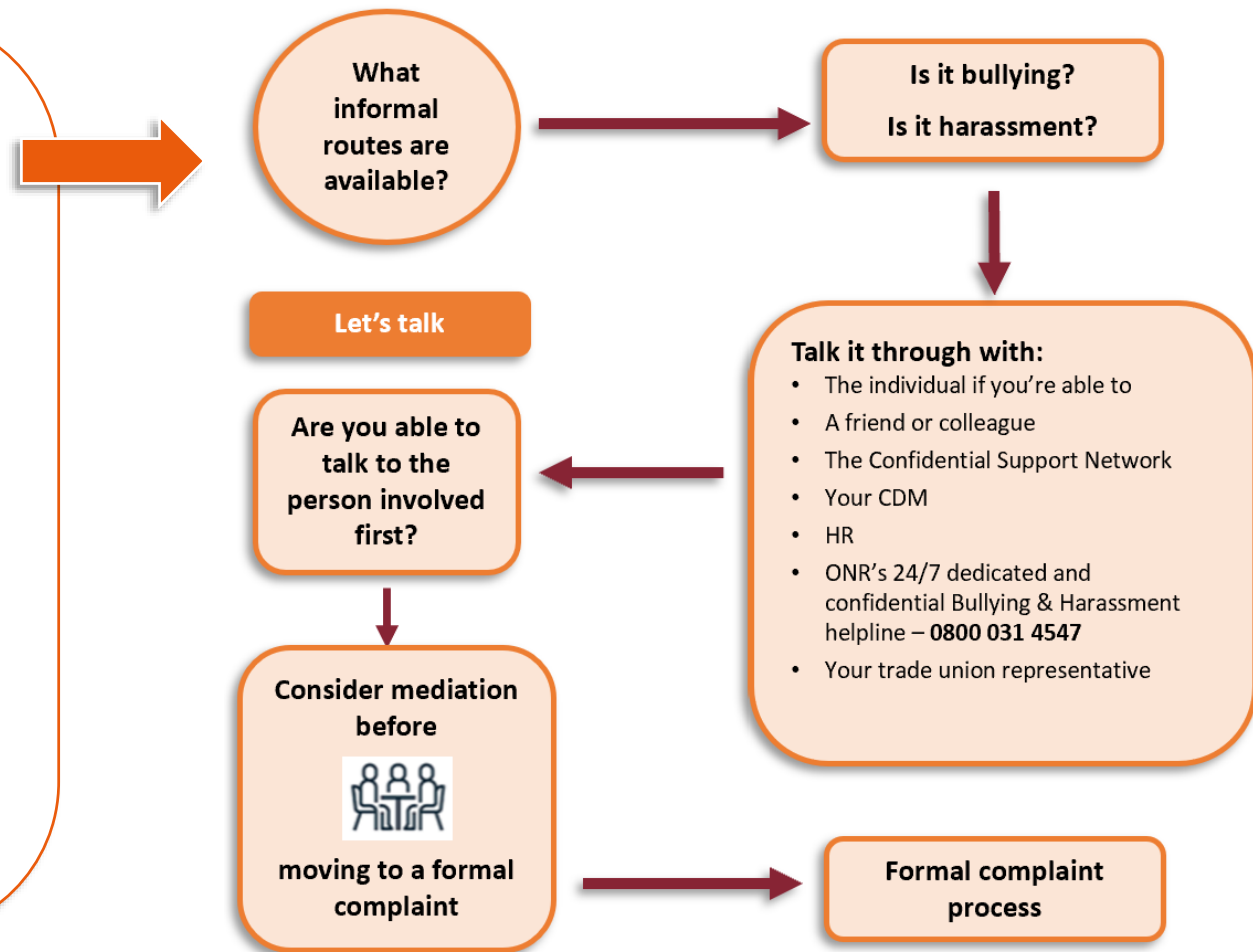
Consider informal routes first for resolving a bullying or harassment issue

We will usually recommend that you try and resolve a bullying or harassment issue via an informal route first before submitting a formal complaint.

Following an informal route first can be the quickest and most effective way of resolving an issue.

Where a situation is more challenging to deal with, a more formal route may be necessary.

Formal action could result in disciplinary action and in some cases lead to dismissal.



Talk to someone in confidence

To a colleague

Find someone you can trust. Don't be ashamed to tell people, confidentially, what's going on. You need to let people know what's happening so they can help you.

To your manager or HR

If you think another colleague is behaving inappropriately towards you, you can talk to your line manager about it. If it is your line manager who you believe is behaving inappropriately towards you, you should approach a more senior manager or contact the HR team.

To someone completely independent

If you don't feel that you can talk to your colleagues or manager, we have two confidential ways of supporting you.

You can use:

- Confidential Support Network or Mental Health First Aiders/Ambassadors
- Confidential Support Network; or
- ONR 24/7 dedicated and confidential **Bullying & Harassment Helpline 0800 031 4547** or go to the [Help EAP](#) website

To your trade union representative

If you are a member of a trade union, they can also offer you advice and be with you when you speak to the person you believe is bullying or harassing you.



Talking to someone - getting the most out of your conversations

Regardless of who you speak to, there are some things that you can consider beforehand:

- **Note down details of what happened**, who was there, when it happened, where it happened and why – was it linked to something?
- **Be clear about the outcome you are looking for.** Can the issue be resolved with mediation? We will usually recommend that you try and resolve a bullying or harassment issue via an informal route first before submitting a formal complaint.
- **What help are you asking for?** Do you want someone to listen and give their view? And/or, do you want representation?



Are you able to talk to the person that's bullying or harassing you?

In some cases, the bullying may not be deliberate. The person upsetting you might not realise the effect of their actions, so you could try talking with them, if you feel you are able to.

Work out what to say beforehand. Describe what's been happening and why you object to it.

Stay calm and be polite. If you do not want to talk to them yourself, ask someone else to do it for you.

You might find the following structure helpful when preparing what you would like to say:

- **Open** the conversation
- **Describe** what is happening and/or what you don't like
- **Explain** how their behaviour makes you feel and the impact of their behaviour
- **State** the change that you would like to see or what you want to stop
- **Be firm**, not aggressive
- **Stick** to the facts
- **Explain** the positive outcome for you and them if the behaviour changes



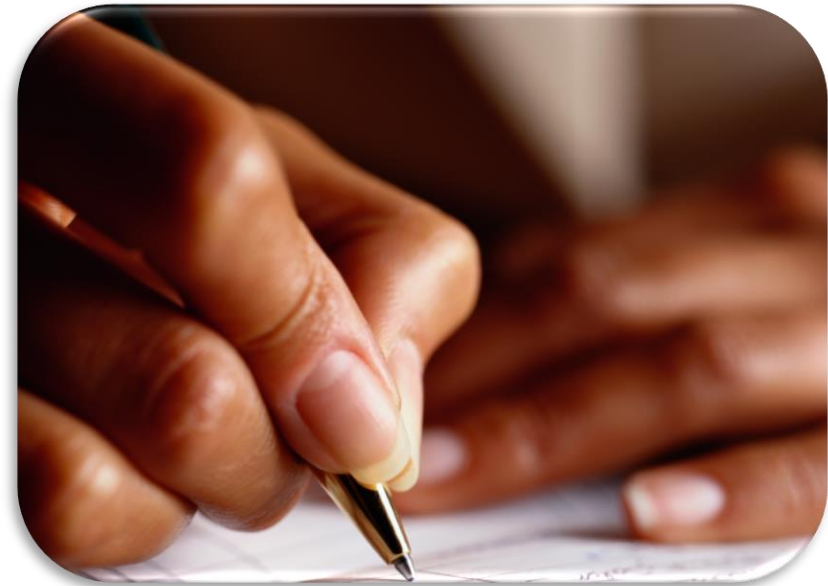
Keep a diary or record of the bullying or harassment

It's also a good idea to keep a diary or record of the bullying or harassment. This is known as a contemporaneous record, and it'll be very useful if you decide to take action at a later stage.

Try to talk calmly to the person who's bullying you and tell them that you find their behaviour unacceptable. Often, bullies retreat from people who stand up to them. If necessary, have a colleague with you when you do this.

Try to record:

- How the bullying made you feel
- Date/s and time it happened
- Any witnesses
- Any evidence, for example emails or screenshots of social media posts



What if I don't feel comfortable talking to the person face to face?

If you do not feel comfortable talking to the person face to face, you could:

- Put what you would like this to say to them in an email; or
- Ask for support from a member of the Confidential Support Network or your trade union representative.

If you do not feel comfortable talking to the person face to face or the bullying continues, you should talk with someone at work that you feel comfortable with. This could be:

- Your CDM or another manager
- HR
- Confidential Support Network
- Mental Health First Aiders/Ambassadors
- Trade union representative



Helpful tips for handling your conversation

1. Some ways that you can open the conversation:

- I would like to discuss what you just said to me ...
- I would like to discuss something you just did ...
- I would like to discuss something that happened between us ...
- It might not have been your intention, but ...
- I hope that you will be open to my feedback ...

2. Describe what you have seen or heard:

- When you do this ...
- When you said this ...
- When you laughed at me ...
- When you interrupted me ...
- When you shouted at me ...
- When you told that joke ...
- When you keep ignoring my requests for a meeting/leave

3. Explain your feelings and the impact it has on you or others:

- I am upset by that comment ...
- I am confused by that comment ...
- It stops me being able to concentrate ...
- I feel intimidated ...
- I feel uncomfortable ...
- I felt humiliated ...
- It causes me stress ...
- I was very upset ...
- I was angry

Mediation

Independent and impartial mediation may be available to help resolve the situation. Both parties involved must agree to mediation.

If you think this may help contact HR.

4. State the change that you would like to see:

- I would like you to speak to me in private rather than raise this in front of others ...
- I would like you to talk to me and not discuss this with others ...
- I would like you not to make any more comments about ...
- I would like you to stop asking me questions about my private life ...
- I want you to discuss this with me calmly ...

5. Indicate the outcome you are looking for:

- I will feel more relaxed ...
- I will be more comfortable ...
- I will feel more respected ...
- I will feel less stressed ...
- I want to sort this out between ourselves ...

Helpful tips – structuring your conversation

Describe



Explain



State



Outcome

Example 1	Example 2	Example 3	Example 4
When you swear at me, as you just did in that meeting, it made me feel humiliated	I feel very uncomfortable when you tell rude jokes about gay people	When you start shouting at me	I know you have a heavy workload
I would like you to stop doing it please	My sister is gay and I find these comments and jokes upsetting	I want to end the conversation immediately	But when you keep ignoring my emails, I feel pretty irrelevant
It will help me feel more respected	I would appreciate it if you would stop making these jokes and comments	I need you to tell me clearly and calmly why you are upset	Can we discuss how we can change this
If you keep doing this, I will have to take this further. I would prefer not to do that	I want us to show respect for everyone and we have no way of knowing who is offended by these kind of jokes	So that I can understand what the problem is	Perhaps you would prefer me to contact you in a different way



How to make a formal bullying or harassment complaint

If you have tried to resolve the issue informally with no success, or if the situation is of a more serious nature that means it would be inappropriate to try and resolve it informally, the next stage is to make a formal complaint.

For guidance on how to make a formal complaint

- Please refer to the [Bullying & Harassment Policy](#) in the Staff Handbook on Nucleus.
- The complaint should be completed using the [Bullying & Harassment complaint form](#) within the staff handbook.
- **You should include:**
 - Who the complaint is against
 - Who witnessed the event (if applicable)
 - What happened e.g. shouted at me
 - Where it happened e.g. staff meeting
 - When it happened e.g. dates
 - Why it happened e.g. project related
 - Any evidence e.g. emails, letters



Next: It is always possible for individuals to have a discussion with HR before submitting a formal complaint to seek advice and further guidance.

- Once the complaint is received, it will be allocated to a HR lead who will review the complaint and ensure that all the necessary information is covered. They will ask if it has tried to be resolved informally. If it can't be resolved informally and an investigation is required it will be allocated to an independent investigator.
- Your manager and HR are there to help support as well as the Employee Assistance Programme (EAP) through the process. Investigations can vary in timings due to the nature and number of people involved, but we will always try to complete them in a timely manner.



Please listen respectfully to someone when they're speaking out

**We want to stop bullying and harassment.
So, if someone asks you to stop, please stop!**



We want everyone to feel empowered to speak out about behaviour that they consider to be bullying and harassment, just as they would if they saw something potentially unsafe or something that could compromise our security



This means we need to be prepared to respectfully speak out and to respectfully listen



If you have been told that your behaviour is making someone feel uncomfortable then stop and reflect on what you are doing. Talk the issue through with the individual and seek support or advice from your manager or HR if necessary



It doesn't matter if it is something you have been doing for years or if it wasn't a problem to your colleagues yesterday or last week



If you have been accused of bullying or harassment

Your behaviour may seem innocent to you, but it is important to consider its effect on others.

Making sexist, racist, homophobic or other offensive remarks, putting your arm around another person's shoulders or other physical contact may seem trivial to you but may well be offensive to others. It may also be unlawful.

If you are told your behaviour is offensive, you should consider the following points.



The other person's reaction to what you say or do is important, not your intention nor the reaction you think they should have.



Listen carefully to the complaint and to the particular concerns expressed



Stop and think about what you have said or done.



If you do not understand the complaint, discuss the matter with your manager, Trade Union representative, HR or someone you trust



If you are found to have bullied or harassed someone after their objection to your behaviour was made known to you, this will make the offence more serious if a formal complaint is made



How can you support a colleague who believes they are being bullied or harassed?

Some of things that you can do to help a colleague or friend

Be practical

- Being bullied or harassed is stressful, but many people will also find the prospect of tackling the situation stressful too.
- Explain the practical things that you can do to help, such as offering moral support, helping to arrange a meeting with their trade union representative or offer to go to meetings with them.

Be patient

Your friend or colleague might not initially want to tackle the issue in the way that you would approach it. Therefore, it's to be as sensitive and supportive as you can be, but without taking over. Let them set the pace.

Listen

Let them lead the conversation and actively listen to what they are saying. Don't interject with your own experiences – keep the focus on them.

Reassure

They might blame themselves for the situation or question what they have done to bring this situation upon them. Reassure them and remind them that bullying and harassment is never okay.

Be respectful

Don't let your own feelings become the driving force behind the actions that your colleague or friend takes. Respect their wishes and feelings and the approach that they want to take to resolve the situation.



Leading by example: If you are a leader - you have a responsibility to stop bullying and harassment

As a leader - here are some things you can do:

- Demonstrate the change. Call it out if you see poor behaviour.
- Hold people to **Account**
- Be **Fair**
- Be **Open**
- **Support** your team if they come to you to say that they are being bullied or harassed.



Where can I get help?

Here's a list of contacts available to help you

Human Resources	Please contact a named member of the ONR HR team or the HR support line: T: 0203 028 0412 or E: ONR.Human-Resources@onr.gov.uk
Confidential Support Network & Mental Health First Aiders/Ambassadors	Search for the D&I page on Nucleus to find contacts. Please note - some colleagues have a dual role
Trade Unions	Prospect - T: 0113 283 4296 or 0115 937 7530 PCS – T: 0151 951 3902 or 0151 951 3659
ONR's 24/7 dedicated and confidential Bullying & Harassment helpline	T: 0800 031 4547 or visit the Help EAP website. See next page for more information about the helpline.
Employee Assistance Programme	onr.optimise.health
Bully Online	bullyonline.org
Workplace Bullying	workplacebullying.co.uk
ACAS helpline	acas.org.uk/if-youre-treated-unfairly-at-work/being-bullied



ONR's 24/7 dedicated and confidential Bullying & Harassment helpline 0800 031 4547

ONR's 24/7 dedicated and confidential Bullying & Harassment helpline: 0800 031 4547 - is operated by experienced advisors, whose role is to provide dedicated support and information to all ONR colleagues.

The helpline will:

- Enable you to ensure that any concerns relating to dignity at work are appropriately addressed
- Ensure that all complaints raised are carefully and proportionately considered in line with our B&H policy and procedures
- Facilitate a private and respectful discussion to explore all available options with you; these may typically include information
- resolution, including use of independent mediation or by making a formal complaint
- Engage with impartiality, independence and in confidence
- Offer practical support and guidance to assist a colleague who may wish to invoke a formal complaint when using the ONR B&H

The B&H helpline: 0800 031 4547 is available 24-hours a day, and accessible seven days a week, and is part of our Employee Assistance Programme, provided by HELP.



Please note - Helpline advisors are not providing legal representation or legal advice.

