

Anti-Bullying, Harassment and Discrimination

Policy



NatWest
Group

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We regularly update this document. Make sure you have the latest version by downloading it from the intranet.

This policy is not contractual and is subject to change at NatWest Group's discretion. It will be reviewed from time to time to make sure it continues to meet the Group's legal obligations and business needs.

Who's this for?

This policy applies to **employees and line managers in Great Britain, Northern Ireland, Republic of Ireland and Offshore (Jersey, Guernsey, Isle of Man and Gibraltar).**

This policy outlines the **expected conduct standards which also applies to agency workers and contractors.** However, should a complaint be made against such a worker, the process followed to address the complaint may vary from the process set out in this policy. In particular, any disciplinary or equivalent action would usually be carried out by the relevant provider or employer of such worker. If you are an agency worker or contractor and want to complain about bullying, harassment or discrimination at NatWest, you can do so by speaking to the line manager of the person you want to complain about, by raising a complaint through [Ask Archie](#) as per the process in this policy, or by contacting your employer or the organisation supplying you to us.

How should you use this policy?

- ☑ The scope of this policy **covers bullying, harassment (including sexual harassment) and all forms of discrimination (including victimisation)**. Throughout the policy we'll refer to all of these elements as bullying, harassment and discrimination.
- ☑ This policy sets out **information for all colleagues (employees and line managers)** which includes:
 - The Group's expected standards of behaviour,
 - Information for employees who have experienced harassment and the support available,
 - Information for employees who are raising concerns or making a complaint,
 - Information for employees who have been the subject of a complaint,
 - How we investigate complaints (including an end-to-end process overview through both informal and formal routes)
- ☑ The policy also outlines **information specific to line managers** on how to support employees who have experienced bullying, harassment and/or discrimination, employees who are raising concerns or making a complaint or employees who have had a complaint raised against them.

Where to go for more information



If you have any questions on bullying, harassment and discrimination or if you're dealing with a complex case, you can [Ask Archie](#) for further support and guidance.

Related content

- ☑ For information on how to raise a complaint about the treatment you've experienced that isn't relating to Bullying, Harassment or Discrimination, you may want to take a look at our [Resolving issues at work Policy](#) (Human Resources > Working Here > Resolving Issues at Work).
- ☑ If you want to understand more about how mediation works, you can find more information on the [mediation](#) page (Human Resources > Working Here > Mediation).
- ☑ If you want to understand more about the disciplinary process, you can find more information on the [disciplinary](#) page (Human Resources > Working Here > Disciplinary).
- ☑ If you want to understand more about how to raise wider wrongdoing, that affects more than one person, take a look at [Speak Up](#) (Useful Sites > Speak Up).
- ☑ Our [Wellbeing Hub](#) has lots of information and tools to support you or your employees (Human Resources > Wellbeing).
- ☑ Further support is also available on our [Diversity, Equity and Inclusion](#) pages where you'll also be find access our Employee Led Networks (Human Resources > Diversity, Equity and Inclusion).

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1. Understanding bullying, harassment, sexual harassment, discrimination and victimisation

1.1 General principles

- The Group is committed to creating and promoting a positive environment free from bullying, harassment, including sexual harassment, discrimination and victimisation for our colleagues, customers, communities, suppliers and shareholders.
- We want to ensure all colleagues, customers and third parties are treated, and treat others, with dignity and respect both in work and at work related events, such as business trips, networking events or social functions.
- We're all entitled to our views and beliefs, but the context in which we express them matters. When you're in work you must be careful about when and how you share your opinions. Not everyone will agree with you, and you shouldn't expect them to. We do expect you to respect different opinions and consider how someone may react to what you're saying - just because you don't intend to be offensive or insulting, that doesn't mean your comment won't meet the definition of bullying, harassment and/or discrimination as outlined in this policy.
- We won't tolerate any form of bullying, harassment or discrimination including those where there is a [protected characteristic](#).
- We'll take pro-active steps to help prevent the bullying, harassment or discrimination of all employees. If any bullying, harassment or discrimination occurs, we'll take steps to resolve concerns or complaints and to prevent it happening again.
- We encourage anyone to raise concerns or a complaint if they are a victim of, witness or become aware of allegations of bullying, harassment or discrimination. We treat any allegation seriously and sensitively and have in place robust policies and procedures to manage instances should they occur. This includes providing Wellbeing support to those who have made a complaint.
- Where bullying, harassment or discrimination allegations are made against you, you can be subject to disciplinary proceedings up to and including dismissal.
- In certain circumstances, complaints of sexual harassment in the workplace can be classed as a 'protected disclosure' under whistleblowing law. This means employees, customers or third parties making a sexual harassment complaint will be protected from detrimental treatment and unfair dismissal.

1.2 Protected characteristics

Protected characteristics vary between jurisdictions, but include:

- Age
- Disability
- Gender reassignment
- Race/ethnicity/nationality
- Religion or belief
- Gender (in Republic of Ireland only)
- Sex
- Sexual orientation,
- Marriage and civil partnership
- Pregnancy and maternity
- Member of the traveling community (in Republic of Ireland only).
- Political Opinion (in Northern Ireland only)

1.3 What is bullying?

- Bullying can be described as unwanted behaviour from a person or group that is either offensive, intimidating, malicious or insulting, or an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.
- Bullying may:
 - Be a regular pattern of behaviour or a very serious one-off incident.
 - Happen face-to-face, on social media, in emails or calls.
 - Happen at work or in other work-related situations.
 - Not always be obvious or noticed by others.

- It's possible someone might not know their behaviour is bullying. It can still be bullying even if they don't realise it or don't intend to bully someone.

Examples of bullying could include:

- Constantly criticising someone's work in an unconstructive manner.
- Spreading malicious rumours about someone.
- Constantly putting someone down in meetings, conversations, emails etc.
- Deliberately giving someone an unreasonable workload than everyone else.
- Excluding someone from team or social events.
- Putting humiliating, offensive or threatening comments or photos on social media.

1.4 What is harassment?

- Employees are protected from harassment related to certain [protected characteristics](#), sexual harassment, or less favourable treatment as a result of rejecting or agreeing to conduct of a sexual nature (or unwanted conduct that is related to gender reassignment or sex).
- To be harassment there must be unwanted behaviour relating to the [protected characteristic](#) that has the purpose or effect of violating the person's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for the person.
- A person may be harassed even if they weren't 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.
- By law, whether someone's behaviour counts as harassment depends on the circumstances of the situation, how the person receiving the unwanted behaviour views it, and if the person receiving the behaviour is 'reasonable' to view the situation as harassment.

What is unwanted behaviour?

- Unwanted behaviour can include but isn't limited to a one-off incident, repeated behaviour, spoken or written words, imagery, graffiti, gestures, jokes, pranks, physical behaviour that affects the person they are directed towards.
- The person being harassed might feel disrespected, frightened, humiliated, insulted, intimidated or threatened.
- Even if the person being harassed doesn't ask for it to stop or object at the time of the unwanted behaviour, it can still be against the law and the employee behaving in this way could be subject to disciplinary action.

1.5 What is sexual harassment?

- Sexual harassment is any unwelcome behaviour of a sexual nature, which has the purpose or effect of violating another person's dignity, or creates an intimidating, hostile, degrading or offensive environment for someone.
- Sexual harassment can also occur if an individual is treated less favourably because they reject or submit to harassment of a sexual nature.
- People respond to situations in different ways. What might seem like an innocent action or remark to one person could be seen as offensive to another.
- If the conduct causes offence, this can still be harassment, even if it wasn't intended to offend.
- Harassment may be verbal, non-verbal, or physical.
- A one-off incident can also amount to harassment.
- A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

Examples of actions that may be considered as, but not limited to, behaviour of a sexual nature include:

- Gestures.
- Staring or leering.

- Unwanted propositions/sexual advances or suggestive behaviour (which the harasser may perceive as harmless).
- Language of a suggestive or explicit nature (even if not directed towards a person).
- Jokes or banter of a sexually explicit nature (even if not directed towards a person).
- Derogatory conversations of a sexual nature and/or unwanted sexual behaviour both at work and outside of work.
- Unwanted deliberate body contact.
- Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome.
- Sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet).

1.6 What is discrimination?

- Direct Discrimination means treating someone 'less favourably' than someone else because of their [protected characteristics](#).
- Indirect discrimination happens when there is a policy, practice or process that is applied in the same way for everybody but disadvantages a group of people who share a [protected characteristic](#).
- Less favourable treatment can be anything that puts someone with a protected characteristic at a disadvantage, compared to someone who doesn't have that characteristic.
- There's no legal definition of 'putting someone at a disadvantage', but it might include:
 - Excluding someone from opportunities or benefits.
 - Making it harder for someone to do their job.
 - Causing someone emotional distress.
 - Causing someone financial loss.
- It can still be discrimination even if the less favourable treatment was not intended.

1.7 What is victimisation?

- Victimisation is when someone is treated less favourably because they're involved with a discrimination or harassment complaint.
- Involvement includes:
 - Making a complaint of discrimination or harassment.
 - Supporting someone else's complaint.
 - Gathering information that might lead to a complaint.
 - Acting as a witness in a complaint
 - Saying something or giving evidence that does not support someone else's complaint

Examples of victimisation may include:

- Denying someone an opportunity because it's suspected that they intend to make a complaint about sexual harassment.
- Excluding someone because they have raised a grievance about sexual harassment.
- Failing to promote someone because they accompanied another employee to a grievance meeting.
- Dismissing someone or selecting someone for redundancy because they gave evidence on behalf of another employee at an employment tribunal hearing.

1.8 Policies and processes to support you

The policy or process available to you will depend on the type of concern or complaint you have, and we have a number of different routes for you to follow. These are:

Anti-Bullying, Harassment and Discrimination (ABHD) Policy	Issues which impact you personally relating to:	<ul style="list-style-type: none"> • Bullying • Harassment • Sexual Harassment • Discrimination
Resolving Issues at Work (RIAW) Policy		<ul style="list-style-type: none"> • Unfair treatment • Relationship issues at work • Organisational change • Personal Health and Safety complaints or issues • Flexible working
Speak Up		<ul style="list-style-type: none"> • ABHD and RIAW issues affecting more than one employee • Sexual Harassment, whether impacting more than one person or not • Criminal activity • Regulatory breaches • Breaches of Policy or Process • Concerns about wrongdoing or misconduct in the workplace impacting groups of customers, colleagues, shareholders, or the public

 Complaints about the annual performance process are not covered by this policy.

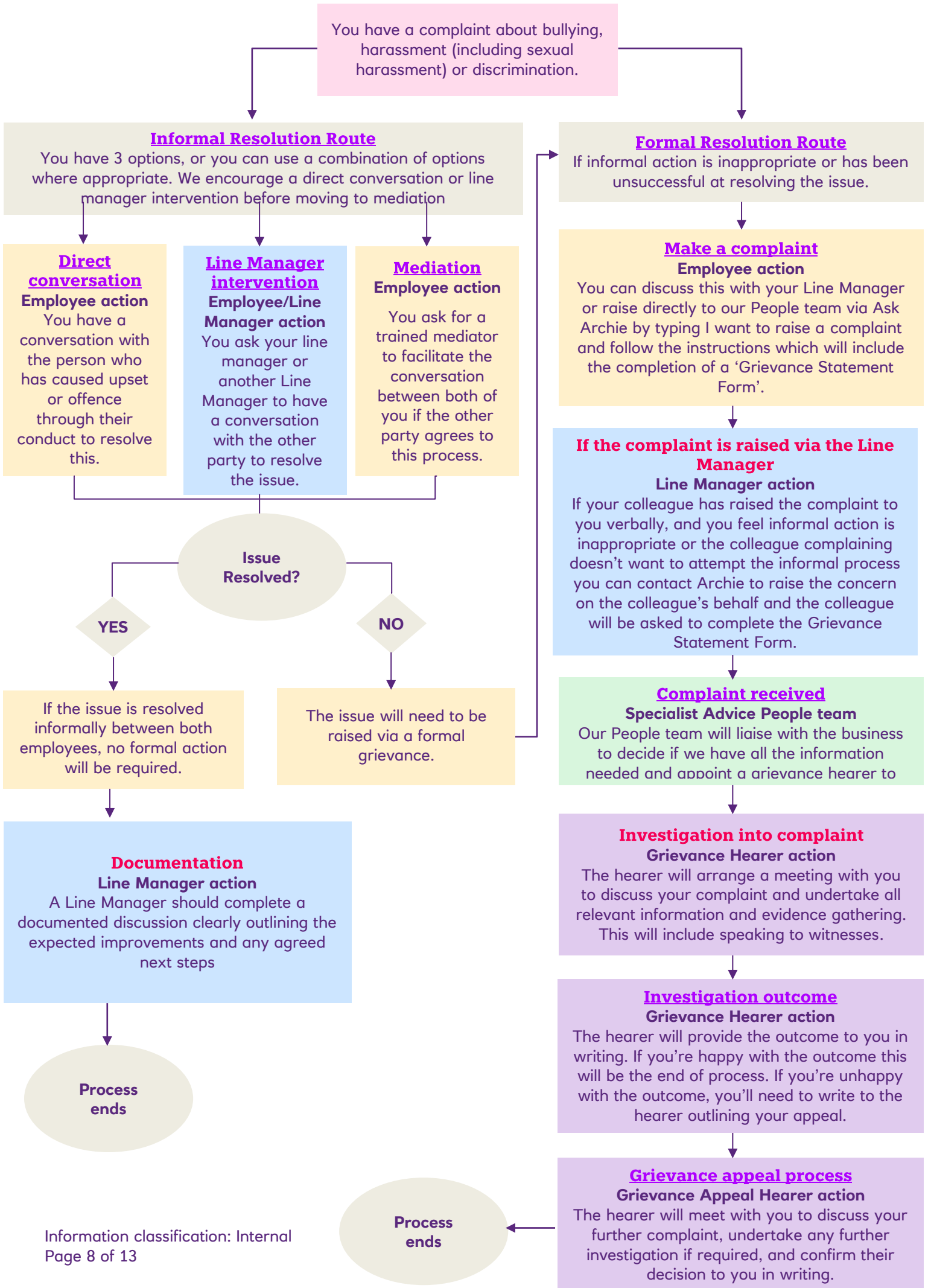
2. What to do if you feel you're being bullied, harassed or discriminated against?

- It's important everyone understands how to raise concerns or complaints when conduct occurs that amounts to bullying, harassment or discrimination.
- There are two routes to resolving concerns or complaints about conduct that amounts to bullying, harassment or discrimination: an informal and formal route.
- If the informal route isn't successful or if resolving something informally isn't appropriate, a formal grievance will be heard by an impartial hearer who will investigate the complaint and decide on an appropriate outcome.
- When initiating the formal route, our Specialist Advice People Team will advise employees and supporting line managers as to whether alternative options may be more suitable depending on the nature of the complaint raised. For example, resolution through direct conversation or mediation. This applies in cases where no attempt at informal resolution have been made.
- Under both routes, you should be clear on what the issue is and what outcome you'd like to see at the end of the process.

2.1. Complaint process overview

Here's an overview of the end-to-end process through both informal and formal routes.

Clicking on the highlighted links will take you to the relevant section in this policy.



2.2. Raising complaints informally

- There are 3 ways you can resolve a complaint informally.
- If informal resolution under any of these routes isn't successful or isn't appropriate in the first place, you'll be able to progress your complaint through the formal route.

2.2.1. Discuss directly with the person responsible

- Depending on the circumstances and if it's appropriate to do so, you may wish to have a discussion with the person who has caused the upset or offence.
- The aim of the conversation is to make the other person aware of how it's made you feel, and that you'd like the behaviours or conduct to stop to resolve the issue.
- You should explain clearly to them that their behavior was unwelcome and made you feel uncomfortable.

2.2.2. Discuss with your line manager

- If you'd like to try to resolve the issue informally but feel it's too difficult to do alone, you can speak to your line manager or another line manager to make them aware of the situation.
- The objective here is for the line manager to speak to/facilitate a conversation with both you and the person who has caused the upset or offence to reach a resolution that suits you both.
- This process may involve further action by the line manager to document the expected behaviours in future, and any additional action to be completed i.e., additional learning or coaching.
- If the case can't be resolved informally or you want to take it formal at any time, you can escalate this to the complaints process by typing 'grievance' in to [Ask Archie](#).
- If you open the case on Archie as a colleague, it'll be investigated under the grievance complaints investigation process. If your line manager raises this on your behalf this will be investigated under the disciplinary process as outlined in the [Disciplinary Policy](#).
- If wrongdoing is evident during the grievance investigation this may then be referred for action under the formal disciplinary process.

Information for line managers

It's important that we take appropriate action depending on the severity of the situation. In some cases, you may be able to help resolve the situation informally through communication and discussion with those involved, and understanding more about what would resolve it for both employees involved.

Sometimes, employees simply want conversations to happen with the other employee who they feel has acted inappropriately and to stop the behaviours from occurring in the future.

It's important that when we have these conversations to set the standards we expect in the future, that we're clear and outline what improvement is required from the employee in the future to prevent this situation from reoccurring.

You should record the details of the conversation, clearly setting the expected behaviours and conduct moving forward and the employee should acknowledge this record. If you would like a documentation template to support this contact [Ask Archie](#). It's important we document the actions if informal resolution is chosen because if there's no improvement or another situation occurs, we can identify this as a pattern of behaviour which will be referred to the formal disciplinary process immediately.

If the employee wants to escalate this formally, they should do so under this policy.


If you, as a line manager, have concerns about conduct or behaviours, or the issue is too serious to be resolved informally, you can progress this formally under the [Disciplinary Policy](#).

Another line manager will be appointed to undertake an investigation and establish the events that have led to the issue. More information is available in the [raising complaints formally section](#).

2.2.3. Attempt mediation

- Mediation is a conversation facilitated by one of our trained mediators between both employees.
- It's a voluntary process that both employees must agree to participate in.
- The mediated conversation can be stopped at any point if one of the parties doesn't want to continue.
- A mediator will remain impartial and support an open, honest and constructive conversation to try to reach a resolution.
- Importantly, the mediator won't decide on the outcome of mediation but will encourage both employees to find a resolution they're both happy with.
- The focus of the conversation should be to discuss the situation, explore options that would resolve the issue and prevent it from happening again. It'll also focus on the future and how both parties can continue to work together.
- The resolution is a verbal agreement between both employees. It won't involve written documentation, or a record of the conversations or agreements made.

 More information on mediation is available [here](#) (Human Resources > Working Here > Mediation).

 If you want to access one of our trained mediators you can [Ask Archie](#) for further support and guidance. Just type 'mediation'.

2.3. Raising complaints formally

- If informal resolution has been unsuccessful, or you want to raise your complaint immediately without attempting informal resolution, you can do this by contacting [Ask Archie](#) and completing the Grievance Statement Form.
- If your concern is about sexual harassment, you can also raise this through Speak Up.
- By raising a formal complaint, an investigation process will begin. Whether you raise your complaint as a grievance through [Ask Archie](#) or a [Speak Up](#), your complaint will be triaged and you'll be informed how each of these processes work so you can choose the right route for you.

In general, if your complaint relates to wider concerns of wrongdoing, whether Sexual Harassment or not, it may be appropriate to raise this via Speak Up. More information can be found on the [Speak Up intranet page](#) (Risk and Security > Speak Up).

2.3.1. Grievance statement form

- The Grievance Statement Form allows you to share details of your complaint.
- It will ask you to confirm information about the issue, who is involved, any witnesses to the incidents or behaviours and what outcome you'd like from the process.
- It's important that you consider a reasonable outcome, and it should be driven by what would help to resolve the issue for you.

 You can access the Grievance Statement Form via [Ask Archie](#), just type 'grievance'.

2.3.2. Investigation process

- Once we've received your form, an impartial hearer will be appointed to investigate your complaint and gather information and evidence relating to the issue. This will include arranging a meeting with you to discuss your complaint.
- Our Specialist Advice People team will support the hearer, providing them advice and guidance on the end-to-end investigation process.

2.3.3. Investigation outcome

- The hearer will confirm the outcome to your grievance in writing.
- The outcome will be based on the information and evidence they've gathered during the investigation.

There are three outcome options available to the hearer:

Decision	What this means	Next steps/Further Action
Not upheld	The complaint was investigated but there is no or not enough evidence to support the complaint.	No formal action will be taken but informal feedback might still be needed.
Partially upheld	The complaint was investigated and there was some evidence to support the concerns.	Further action may be needed to resolve the issue.
Fully upheld	The complaint was investigated, and there was evidence to support all the complaint	Further action should be taken to resolve the issue. This action could be formal or informal. Disciplinary action may be required.

Sometimes it's appropriate for further action to be completed, usually in relation to the person who has had the complaint raised against them. Further action may include, but isn't limited to:

- Additional learning.
- Coaching.
- Use of a mediator to help fully resolve the issue if agreed between both parties.
- Documentation of a discussion confirming the improvement expected in future.
- Consideration of whether the case should be referred to a disciplinary process under our Disciplinary Policy. Aggravating factors, such as abuse of power over a more junior colleague, may be relevant in deciding what disciplinary action to take.
- If this process is initiated, the employee raising the complaint won't receive updates on the disciplinary process.

2.3.4. Appealing the decision

- You're able to appeal the grievance outcome and can do so by contacting [Ask Archie](#) within 14 calendar days of receiving the response to your grievance.
- When submitting your appeal, you must clearly outline your rationale. For example, you feel the grievance procedure was wrong or unfair or you have new evidence to show. An appeal can take the form of a case review, or the case being re-heard in full.
- An impartial hearer will be appointed to conduct either a review or a re-hearing.
- A rehearing will generally only be considered if significant new evidence is available or if the original procedure was incorrect or unfair.
- The grievance appeal hearer will review the appeal, arrange a formal meeting to discuss the reasons for the appeal and may carry out further investigations.
- Once the case review or full appeal hearing (including any further investigations) is complete, you'll be informed of the decision in writing.
- For colleagues in GB and Offshore, the decision of the appeal is final and there will be no further recourse.

2.3.5. External Appeal (for colleagues in Northern Ireland and Republic of Ireland only)

- For colleagues in Northern Ireland and the Republic of Ireland, if you're not satisfied with the outcome of the grievance appeal, you may request that the matter is referred to a suitable independent person.

- This request must be made in writing, setting out the grounds of your appeal within 14 calendar days of receiving the response to the initial appeal. Use [Ask Archie](#) to do this by typing in 'Grievance Appeal'.
- The independent appeal hearer will be agreed by both parties and the Labour Relations Agency or the Labour Relations Commission may assist in identifying a suitable independent person.
- The decision of the independent person will be final for both parties, and there will be no further recourse.



Information for grievance hearers

If you receive an appeal, go to [Ask Archie](#) to raise the appeal case. Just type 'grievance appeal'.

3. Support for those impacted by bullying, harassment or discrimination

- It's important we support the wellbeing of all employees impacted by bullying, harassment or discrimination and or by complaints raised about these matters. This is regardless of whether (i) a complaint has been raised or (ii) their role in the process through either the informal or formal route outlined in this policy.
- If your line manager isn't involved in the grievance complaint, they'll continue to support your wellbeing.
- If your line manager is involved in the grievance complaint, and it's not appropriate for them to support you (e.g., your complaint is about them or they have complained about you), another manager will be appointed to support your wellbeing throughout the process.
- If you are the subject of a complaint, or a witness to the investigation, and need support speak to your line manager in the first instance.

3.1. Employee Assistance Programme

Our Employee Assistance Programme (EAP) is a free, independent and confidential service for all Group employees and line managers and is available 24 hours a day; 7 days a week. Impartial support is provided through telephone consulting, online information, toolkits, and face to face counselling.

3.2. Wellbeing on the Intranet

Our [Wellbeing Hub](#) will also provide you with further information and support (Human Resources > Bringing the best of yourself to work > Wellbeing).



Information for line managers

You may want to schedule additional 1:1s with the employees involved whilst the process is ongoing, and make sure employees are aware of the additional wellbeing support and EAP available on the [Wellbeing Hub](#).

If you're involved in the grievance and it's not appropriate for you to support the wellbeing of the employees involved, appoint another manager to provide support.

Line Managers can access the EAP line manager direct line by contacting the EAP and confirming that you're a line manager when you call.

3.3. Support through other policies

- Sometimes employees may ask for a period of leave due to the impact a complaint about bullying, harassment or discrimination can have on them.
- Employees may ask for flexible working adjustments, they may ask for a period of Special Leave, or they may feel they're unfit for work due to the complaint.

- It's important we support our employees throughout the process, and you should refer to the [Flexible Working](#), [Sickness Absence](#) and [Holiday & Other Leave](#) policies for support on what leave is available.

4. Representation during meetings

- At formal grievance meetings or at the grievance appeal meeting, the employee raising the complaint can be accompanied by a fellow employee, a trade union representative or an official employed by a trade union.
- A trade union representative who is not an employed official must have been certified by their union as being competent to accompany an employee in a grievance hearing. This evidence needs to be provided to the hearer before the meeting.
- Representatives may participate fully in the meeting but can't answer questions on the employee's behalf.
- Representatives must be available to attend meetings/appeal meetings and shouldn't cause unreasonable delays to the process.

5. Confidentiality

- Any information or evidence shared or obtained during the grievance process will be treated sensitively.
- Any statements made in connection with the grievance complaint will be shared with the person who raised the grievance.
- Where necessary, the Group will share relevant information, on a strictly need to know basis, with the people directly involved in the matter, including:
 - The employee making the complaint.
 - The employee being complained about.
 - Managers.
 - Witnesses.
 - Representatives.
 - Those acting in an advisory capacity e.g. People teams.

6. Overlapping People policies or processes

- If a grievance complaint is raised during another People process, the process will not normally be suspended in order to deal with the complaint.
- For example, if a complaint is raised during a disciplinary case and the grievance and disciplinary cases are directly connected, it may be appropriate to deal with both issues concurrently. If this applies to you, you'll be advised of the applicable processes at the time.
- It's expected that you won't make this type of complaint to be malicious or to cause trouble, and that you will make complaints when genuine behaviours, incident or events occur. If you're found to be making a complaint with this intent, you may be subject to further action under the [Disciplinary Policy](#).

7. Post-Employment complaints/grievances



Information for line managers

If you receive a post-employment complaint (i.e., a complaint raised after the end of employment) from an ex-employee, you should [Ask Archie](#), just type 'grievance' for advice on the most appropriate course of action.