



*"Offering our community more than a home"*

## **Dignity at Work Policy**

SMT Review date:	March 2026
Previous Approval:	24 November 2020
Management Committee submission:	April 2026
Next Review date:	March 2029 (or when new guidance received)

### **CHA Objectives:**

- To ensure that our resources are adequate to deliver our objectives by investing in our people, increasing digitalisation, demonstrating value for money and through robust procurement practices.
- To manage the houses provided, in a professional and cost-effective manner, for the benefit of our local community and the environment.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

### **Regulatory Standards:**

- The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these objectives.
- The RSL manages its resources to ensure its financial well-being and economic effectiveness.
- The RSL conducts its affairs with honesty and integrity.
- The governing body and senior officers have the skills and knowledge they need to be effective.

***If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.***

# Clydebank Housing Association Limited

## Dignity at Work Policy

### Introduction

Clydebank Housing Association (CHA) is committed to providing a working environment and culture where all employees have the right to be treated with dignity and respect which is free from harassment, bullying, sexual harassment, discrimination and victimisation of any nature. Every employee, agency worker and consultant of CHA has a responsibility to treat anyone who is association with the work of CHA with dignity and respect, regardless of any personal characteristic.

We believe that a culture of equality, diversity and inclusion not only benefits CHA but supports wellbeing and enables people to work better, be themselves and feel that they belong.

### Background

The definitions concerning some of the terminology used within the scope of dignity at work have changed over the years. Most recently the Equality Act 2010 provided a legal definition of harassment but there is still no current legal definition of bullying. However ACAS provides a definition which is widely recognised as being best practice.

### Legal Framework

There are a number of legal principles contained in the following legal documents that will apply as follows:

#### **The Equality Act 2010**

Protects the rights of individuals and advances equality of opportunity for all.

#### **Worker Protection Act 2023**

An amendment of the Equality Act 2010 aims to better protect employees from sexual harassment, prioritising prevention.

#### **Public Interest Disclosure Act 1998**

Provides protection to employees who have been victimised at work or they have lost their job due to a disclosure they raised.

#### **Health & Safety at Work Act 1974**

Sets out the framework for managing workplace health and safety in the UK.

### Definitions

**Protected Characteristics:** The legal grounds in which discrimination claims can be made. These include age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation.

**Harassment:** 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. CHA will extend this definition to include all and will not be restricted to those identified as having a protected characteristic.

Harassment can occur where someone perceives another person to have a protected characteristic. Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic.

Examples of harassment could include but not limited to:

- "banter", jokes, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory against any other protected characteristic.
- unwanted physical behaviour, for example, pushing or grabbing.
- excluding someone from a conversation or a social event or marginalising them from the group.
- unwelcome comments about someone's appearance or the way they dress that is or is not related to a protected characteristic.
- revealing someone's sexual orientation against their wishes or threatening to.
- consistently using the wrong names and pronouns following the transition of a person's gender identity.
- displaying images that are offensive.
- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

**Sexual Harassment:** conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct

**Please refer to CHA's Sexual Harassment Policy for specific information relation to sexual harassment.**

**Bullying:** Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient. If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful

Examples of bullying could include but not limited to:

- Spreading a false rumour
- Consistently giving heavier workloads to one particular individual in a team
- Unjustly cutting off or preventing someone from reasonably expressing their views in a meeting
- Regularly undermining the authority of any other employees.

**Victimisation:** Treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

**Unacceptable behaviour:** A one-off act, if it is serious, can amount to bullying or harassment. All behaviours will be guided by and in line with CHA's Code of Conduct.

Examples of unacceptable behaviour could include but not limited to:

- derogatory comments, offensive language, remarks or jokes.
- spreading malicious rumours or insulting someone.
- insulting behaviours or gestures.
- displaying offensive or suggestive literature or remarks.
- intrusion by pestering, spying or stalking.
- embarrassing, threatening, humiliating, patronising or intimidating remarks.
- physical or verbal assault, such as shouting.
- undermining a person's self-esteem, for example by constantly making unfavourable comparisons with others or belittling their status.

Harassment, bullying, victimisation or unacceptable behaviours may be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. These may occur at work or outside work.

It is not the intention of the perpetrator (the person accused of bullying or harassment) that decides whether bullying or harassment has taken place; instead, it depends on whether the behaviour is unacceptable by reasonable normal standards and is harmful or unwelcome to the person or people on the receiving end.

## **Policy Principles**

This Dignity at Work Policy aims to:

- Set out standards of behaviour expected for employees, agency workers and consultants of CHA.
- Ensure that employees, agency workers and consultants are able to report any unacceptable behaviours, and relevant action is taken to resolve it.
- Promote proactive and preventative measures to support positive and respectful working relationships.
- Ensure integration of diversity into all aspects of CHA's business
- Ensure that all employees, agency workers, and consultants are treated with respect and dignity from each other.
- Set clear guidelines and standards regarding treatment of employees by third parties.
- Ensure that all employees, agency workers, and consultants respect the differences within the community they serve and treat customers and members of the public accordingly.
- Provide a working environment where all backgrounds, cultures, values and lifestyles are respected and treated with dignity at all times.
- Provide a process for complaints to be properly managed.

## **Implementation of Policy**

The Chief Executive is responsible for the implementation and review of this policy.

CHA will ensure that all new employees, agency workers, and consultants will receive an induction on this policy. The policy will be integrated into all policies and procedures within CHA. Copies of this policy will be issued to all employees, agency workers, and consultants and will be available to all who request it (on staff intranet).

This policy applies to all employees, agency workers, and consultants of CHA and therefore all mentioned parties, all have a responsibility to abide by the principles

outlined above and also alert their Line Manager or Chief Executive should any behaviours be witnessed which breach this policy.

Unacceptable behaviour and practices will not be tolerated. However, if or when a situation arises it will be dealt with immediately, as inaction is not an option. Behaviours found to be breaching this policy will be regarded as misconduct and will be dealt with appropriately and in accordance with the relevant policies, including code of conduct and disciplinary. Serious cases may be regarded as gross misconduct and may result in dismissal.

## **Roles & Responsibilities**

### **Organisational**

CHA are committed to providing a safe and respectful workplace and promoting a working environment based on dignity and trust, and one that is free from discrimination, harassment, bullying or victimisation. We therefore adopt a zero-tolerance approach to instances of bullying or harassment.

We are committed to taking proactive measures to prevent all forms of bullying and harassment, including sexual harassment, of our employees, agency workers and consultants.

### **Employees, Agency Workers and Consultants**

All employees, agency workers and consultants have a personal responsibility to act in line, observe and uphold this policy and follow CHA's Code of Conduct. All employees, agency workers and consultants also have the responsibility to participate in any relevant mandatory training course.

### **Managers**

Anyone responsible for leading, managing or supervising people have additional responsibilities to ensure:

- They understand their own and the organisational responsibilities.
- They are familiar with content of the Dignity at Work Policy and communicate to the relevant people.
- Role model behaviours expected and encouraged a positive workplace culture
- Challenge unacceptable or questionable behaviour they become aware of.
- Ensure any breaches or complaints relating to this policy are responded to quickly, sensitively, confidentially and investigated in line with policy.

## **Procedure in Dealing with breaches of Dignity & Respect**

This procedure is complemented by CHA's Code of Conduct, Equality & Diversity, Harassment and Discipline & Grievance policies.

Where an employee feels that they have been discriminated against, victimised or harassed by another employee, not been treated with dignity & respect at work, there are a number of ways in which this can be addressed.

### **Informal stage**

Where possible, breaches of this policy should be dealt with informally in the first instance. In many cases inappropriate behaviours are unintentional and can easily

be resolved once the behaviour has been highlighted. This is often the most efficient way to maintain positive working relations.

In managing the issue informally, employees should:

1. In the first instance alert their line manager to the behaviour.
2. Thereafter the employee should be encouraged by the line manager and with their support approach the individual and highlight what behaviour has been offensive. Should the employee be uncomfortable with this then the line manager should approach the individual and have the same discussion.
3. A note should then be put on file of the person who has displayed the inappropriate behaviour and the individual that raised the issue.

### **Formal Stage**

If the behaviour is of a more serious nature or it continues after the informal approach has been taken, then the issue should be dealt with by mirroring CHA's grievance procedure.

1. The employee must put their concerns in writing and give this to their line manager.
2. The line manager should then arrange a meeting with the employee who has highlighted the concerns. At this meeting the manager should establish what the concerns are, and how the employee would like things resolved.
3. The manager should then conduct any necessary investigations. No investigation should take place prior to there being a meeting with the employee.
4. Once the investigation has been concluded, there could be a variety of outcomes including:
  - There is no evidence to uphold the complaint
  - There is evidence that may involve action against another employee which will be managed through CHA's Disciplinary Policy
  - Learning is identified on an organisational basis

Where action is taken regarding an employee, agency worker and consultant other than the person who raised the complaint, the complainant will not be informed of any action taken against other individuals.

### **Support for those affected or involved**

We understand that anyone affected by, or involved with, a complaint relating to a breach of this policy may feel anxious or upset and we will do what we can to support you.

### **Malicious Allegations**

Any person found to be making fictitious or malicious allegations will be dealt with through CHA's disciplinary procedure which may result in dismissal.

## **General Data Protection Regulations (GDPR)**

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Policies. Information regarding how your data will be used and the basis for processing your data is provided in CHA's employee privacy notice.

## **Review of Policy**

Responsibility for review and monitoring the application of this policy will rest with the Chief Executive. This policy will be reviewed every three years and in line with:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

## **Equality & Human Rights**

We will not discriminate on the grounds of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, and Sexual Orientation. An Equality Impact Assessment has been carried out and none of these protected groups will be unduly affected by this Policy. The Policy applies to all.

The Association will provide equality of opportunity and fair treatment for all, ensuring that no individual or group is treated less favourably than anyone else. We work closely with community stakeholders, to provide assurance that we are achieving these aims.

The Association will meet, and where appropriate exceed our obligations under the Equality Act 2010, including the general equality duty in the Act, to ensure we do not discriminate against, harass or victimise a person because they have one or more of the nine protected characteristics described in the Act.

## **Equality Impact Assessment**

In order to reinforce our commitment to equality and to ensure that everyone is treated equally, that our services are accessible to all and that our practices are, at all times, within the law and free of discrimination of any kind, an impact assessment has been carried out as part of the review of this Policy. It has been established that there should be no significant positive or negative impacts for any groups regarding the operation of this policy.

### **For Office Use Only – Required Actions**

Customer or 3 <sup>rd</sup> party Consultation and Update Required/Arranged	No
Intranet Update	Yes
F Drive Update	Yes
Website Update	Yes
Leaflet change required?	No
Newsletter Promotion?	No
Other information updated, e.g. posters, automatic email responses, post cards, answering machine messages, etc.	No
Equality Impact Assessment completed and attached	Yes

## Clydebank Housing Association Equality Impact Assessment Tool

The Equality Impact Assessment process aims to prevent discrimination against people who are categorised as being disadvantaged or vulnerable within society (as listed in point 4).

Name of the <b>policy / proposal</b> to be assessed	Dignity at Work	Is this a <b>new policy / proposal or a revision?</b>	Revision
Person(s) responsible for the assessment	Lynette Lees		
<b>1. Briefly describe the aims, objectives and purpose</b> of the policy / proposal	To provide a working environment which is free from harassment, bully, and intimidation of any nature. Unacceptable behaviour and practices will not be tolerated		
<b>2. Who is intended to benefit</b> from the policy / proposal? <i>(e.g. applicants, tenants, staff, contractors)</i>	Employees, agency workers and consultants		
<b>3. What outcomes are wanted</b> from this policy / proposal ? <i>(e.g. the benefits to customers)</i>	Ensure integration of diversity into all aspects of CHA business and that all the above mentioned are treated with dignity and respect and all are provided with a working environment where all backgrounds respected.		

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*)

Minority Ethnic    Gender    Disability     Sexual Orientation     Age     Religion     Transgender /Transsexual     Marriage /Civil Partnership     Pregnancy /Maternity

5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.

Protected characteristics – legislation (harassment – CHA extends to all – no particular group will be adversely affected by this Policy -

	Positive impact(s)	Negative impact(s)
6. Describe the <b>likely positive or negative impact(s)</b> the policy / proposal could have on the groups identified in part 4		

7. What **actions** are **required** to address the impacts arising from this assessment? (*This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts*).

Signed:                     L Lees                     (Job title):                     Chief Executive                    

Date the Equality Impact Assessment was completed:                     25.03.2026                    

***Please attach the completed document as an appendix to your policy / proposal report***