Anti-Bullying and Harassment Policy

HUMAN RESOURCES



June 2025

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If you require this document in an alternative language, in larger text, Braille, easy read or in an audio format, please contact the Council at diversity@scilly.gov.uk or telephone 01720 424000

1. Introduction

- 1.1 The Council of the Isles of Scilly (CIOS) has a duty to provide a safe, healthy and inclusive workplace for everyone. We are committed to creating a culture where everyone is treated with dignity and respect. Bullying, harassment and victimisation are not acceptable in the workplace. The Council will promptly address any behaviour of this kind.
- 1.2 This policy incorporates the Council's Anti-Sexual Harassment policy provisions. The Council will assess the risk of sexual harassment in the course of employment, and take preventative action, monitoring the effectiveness of the steps taken to prevent sexual harassment at work.
- 1.3 This policy will be made clear to the stakeholders which staff members come into contact with, for example suppliers, partner organisations, service users and the general public.
- 1.4 This policy does not form part of your contract and may be amended from time to time as appropriate.
- 1.5 The Council will review the policy at regular intervals, monitor its effectiveness and implement any changes that may be required.

2. THE SCOPE OF THIS POLICY

- 2.1 This policy covers bullying and harassment of and by managers, employees, contractors, casual workers, agency staff, volunteers and anyone else engaged to work at the Council, whether by direct contract with the Council or otherwise (collectively referred to as 'workers in this policy).
- 2.2 If the complainant or alleged harasser is not employed by the Council, e.g. if the worker's contract is with an agency, this policy will apply with any necessary modifications such as that the Council could not dismiss the worker but would instead require the agency to remove the worker, if appropriate, after investigation and disciplinary proceedings.
- 2.3 The policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, e.g. business trips and work-related social events.

3. POLICY STATEMENT

- 3.1 Bullying and Harassment can have very serious consequences for individuals and the Council. It may make people unhappy, may cause them stress and affect their health and family and social relationships, may affect their work performance and could cause them to leave their job. Severe cases of harassment and bullying can even lead to mental illness and suicide. Effects on the Council can include loss of morale, poor work performance, increased turnover of staff, legal claims and damage to the Council's reputation. For service users it can have a negative impact on the services we provide to them.
- 3.2 Employees who are found to have bullied or harassed others may face disciplinary penalties, up to and including dismissal, could be personally liable to pay compensation in legal claims, and may find their own family and social relationships are adversely affected. Serious harassment may be a criminal offence.
- 3.3 For all these reasons it is important to prevent bullying and harassment from happening, and to have clear procedures for reporting issues and addressing them quickly and appropriately.
- 3.4 The Council has a zero-tolerance approach to bullying and harassment, including sexual harassment (for example casual sexism and sexualised comments or banter).
- 3.5 The Council will not tolerate any victimisation of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint.
- 3.6 All allegations of bullying, harassment and/or victimisation will be investigated and, if appropriate disciplinary action will be taken, which could result in dismissal.

4. **DEFINITIONS**

4.1 **Bullying** is:

- unwanted behaviour from a person or group that is either:
 - o offensive, intimidating, malicious or insulting, or
 - o an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone
- bullying can be a single or series of incidents of behaviour

Bullying may also happen outside the work environment, for example at work events, on messaging apps, social media, via email or via text, audio or video messages.

4.2 Harassment related to a protected characteristic is:

- unwanted conduct that harms a person's dignity, or
- creates an intimidating, hostile, degrading, humiliating or offensive environment, and
- is related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age

Sexual Harassment is:

• when a worker is subjected to unwanted conduct as defined above and which is of a sexual nature. The conduct need not be sexually motivated, only sexual in nature.

Another form of harassment is **less favourable treatment for rejecting or submitting** to sexual harassment.

All of these types of harassment are unlawful under the Equality Act 2010 and will not be tolerated. The law requires employers to take reasonable steps to prevent sexual harassment of their workers. Harassment or victimisation may lead to disciplinary action up to and including dismissal. Aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take.

The Worker Protection (Amendment of Equality Act 2010) Act 2023 (effective from 26 October 2024) also requires employers to proactively prevent sexual harassment in the workplace.

Harassment, including sexual harassment, can happen outside of the usual working environment including at staff socials and via email, social media and direct messaging

4.3 **Victimisation** is:

- subjecting a person to a detriment because they have, in good faith,
 - o complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or
 - o supported someone to make a complaint, or
 - o given evidence in relation to a complaint.

Provided that you act in good faith, that is, you genuinely believe that what you are saying is true, you have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the Council will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised you.

- 4.4 Examples of bullying, harassment and victimisation are given in **Appendix 1**.
- 4.5 Harassment, sexual harassment or victimisation may lead to disciplinary action up to and including dismissal if it is committed:
 - in a work situation
 - during any situation related to work such as at a social event with colleagues
 - against a colleague or other person connected to the employer outside of a work situation, including on social media, or
 - against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

5. THIRD PARTY HARASSMENT:

- 5.1 The Council operates a zero-tolerance policy in relation to harassment perpetrated against one of its workers by a third party, such as a service user, supplier, or member of a partner organisation. The law requires employers to take reasonable steps to prevent sexual harassment by third parties.
- 5.2 All workers are encouraged to report any and all instances of harassment that involve a third party in line with our reporting procedure (see Section 7.1 below).
- 5.3 If we find that the allegation is well-founded, we will take steps we deem necessary in order to remedy this complaint and prevent it from happening again. This can include, but is not limited to:
 - warning the individual about the inappropriate nature of their behaviour
 - banning the individual from certain Council sites
 - reporting the individual's actions to the police where a criminal offence may have been committed
 - Sharing information with other sections of the Council
- 5.4 In addition to this, the Council will endeavour to take reasonable steps to deter and prevent any form of harassment from third parties taking place.
- 5.5 Bullying or harassment of service users, suppliers, visitors or others by Council employees will be dealt with through the disciplinary procedure.

6. Roles and responsibilities

6.1 Employees, managers, contractors, agency staff, volunteers and anyone else engaged to work at the Council must:

- Be aware of your own behaviour and the effect it could have on other people.
- Behave in a way that does not cause discomfort or offence to other people.
- Not to take part in, encourage or accept the bullying, harassment or victimisation of others.
- Make it clear that you find such behaviour unacceptable.
- Report any concerns to your manager. If the concerns are about your manager, report to their manager.
- Encourage colleagues to use this policy.

6.2 Managers must:

- lead by example, consistently role-modelling appropriate behaviours, language and actions.
- create an environment where treating people with dignity at work is always practised.
- encourage your team members to report any concerns about bullying, harassment and victimisation.
- take prompt action to stop any bullying, harassment and victimisation that you become aware of (without waiting for a formal complaint).
- manage any incidents promptly, fairly, confidentially and in line with this policy.
- make sure any concerns about a team member's behaviour, attendance, or performance are managed reasonably and fairly, and using our policies.
- Anticipate scenarios when employees, workers, contractors or volunteers may be subject to sexual harassment in the course of their employment, and undertake a risk assessment, with mitigating actions put in place to prevent the risk of sexual harassment.

6.3 The Council will:

- Provide mandatory training to managers in how to conduct their duties under this
 policy, including taking reasonable steps to prevent workers from being subjected
 to bullying and harassment at work (including sexual harassment), and how to
 respond when bullying or harassment is reported to them.
- Have regular mandatory training for all workers, tailored to the workplace and audience, repeated at interim periods.

7. PROCEDURE

7.1 What should I do if I am being Bullied, Harassed or Victimised (including sexual harassment)?

- 1. Make a written record of any incidents you are concerned about.
- 2. Approach the other person directly, if possible and appropriate.

In some circumstances it may be possible in the first instance to approach the other person directly and ask them to stop the behaviour. The person may not know that their

behaviour is unwelcome or upsetting. An informal discussion may help them to understand the effects of their behaviour and agree to change it. You could tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately. You could outline the effect their behaviour is having on you. You could add that, if the behaviour continues, you intend to make a complaint to your manager/a more senior manager.

This approach, either verbally or in writing, would be on an informal and confidential basis. You should keep a note of the date and what was said and done. This will be useful evidence if the unacceptable behaviour continues, and you wish to make a complaint.

In many situations, the above action will be sufficient to stop the behaviour complained of and resolve the situation.

3. Report your concerns informally

If the above approach does not work, or you wish to resolve the situation informally but feel unable or do not wish to use the above approach, you should report your concerns informally to any of the following, seeking their advice and help to resolve the situation:

- a) Your manager
- b) Your manager's line manager
- c) The Head of HR
- d) Your Trade Union Representative (if you are a TU member)
- e) If you are working on-call or Out Of Hours, you can contact the Duty Manager phone on 07858 685748.

7.2 INFORMAL RESOLUTION

- 7.2.1 All concerns raised informally will be fairly and thoroughly investigated and appropriate action taken.
- 7.2.2 The Council will treat complaints of bullying, harassment or victimisation sensitively and confidentially. Informal investigation of allegations will normally require limited disclosure on a "need to know" basis. For example, your identity and the nature of the allegations must be revealed to the person you are complaining about, so they are able to respond to the allegations. Some details may also have to be given to potential witnesses, but the importance of confidentiality will be emphasised to them.
- 7.2.3 Support will be offered for those dealing with disclosures of bullying, harassment (including sexual harassment) or victimisation, and those leading this work within the organisation. This will include access to counselling or setting up specific access to trauma-informed support.
- 7.2.4 We will seek to resolve issues informally unless the conduct complained of is serious or informal action does not resolve the problem. Informal management action would include a fair and thorough investigation to establish what has happened, and appropriate actions taken to resolve the situation. Appropriate resolutions could include formal disciplinary action (if evidence of misconduct is identified), informal facilitated discussions to rebuild working relationships, mediation, restorative justice, training and support.

- 7.2.5 Concerns raised informally will be treated as an informal grievance under the Grievance Procedure.
- 7.2.6 A record of any informal actions will be kept by the Council, including measures taken to ensure that the bullying or harassing behaviours are prevented in the future.

7.3 FORMAL PROCEDURES

- 7.3.1 If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can submit a formal grievance under the Council's Grievance Procedure. In the case of grievances about bullying or harassment, the normal grievance procedure is modified so that you can choose whether to raise your grievance with your manager or with a more senior manager.
- 7.3.2 Please see **Appendix 2** for details about investigations into allegations of bullying, harassment and victimisation, including confidentiality, managing risk, investigation methodologies and wellbeing support.
- 7.3.3 Incidents of bullying, harassment and/or victimisation will be dealt with under the Council's disciplinary policy, and may result in disciplinary action up to and including dismissal without notice. Serious bullying, harassment and/or victimisation may amount to other civil or criminal offences, e.g. a civil offence under the Protection from Harassment Act 1997 and criminal offences of assault.
- 7.3.4 You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.

7.4 ONGOING MANAGEMENT

7.4.1 Following an informal or formal resolution of the issues, a manager will monitor the situation, to make sure there is no repeat of any unacceptable behaviour. This may include checking with the complainant that the situation has remained satisfactory.

8. What happens if I am accused of Bullying and/or Harassment?

8.1 If someone approaches you informally about your behaviour, do not dismiss the complaint out of hand because you were only joking or think the complainant is being too sensitive. Remember that different people find different things acceptable and everyone has the right to decide what behaviour is acceptable to their and to have their feelings respected by others.

You may have offended someone without intending to. If that is the case, the person concerned may be content with an explanation and an apology from you and an assurance that you will be careful in future not to behave in a way that you now know may cause offence. Provided that you do not repeat the behaviour that has caused offence that may well be the end of the matter.

- 8.2 If a formal complaint is made about your behaviour, this will be fully investigated and the Council may bring disciplinary proceedings, if appropriate. The Council will follow its disciplinary procedure and you will have the rights set out in that procedure. You will have the right to be informed of the allegations against you and to put your side of the story and to be accompanied to meetings by a trade union representative or work colleague of your choice. The procedure will be implemented at the appropriate stage for the seriousness of the allegation. Complaints of bullying and harassment may amount to allegations of gross misconduct that, if proved, could lead to dismissal without notice.
- 8.3 If a complaint is made against you that is not upheld and the Council has good grounds for believing that the complaint was not made in good faith, the Council will take disciplinary action against the person making the false complaint.
- 8.4 You must not victimise a person who has made a complaint in good faith against you or anyone who has supported them in making the complaint or given evidence in relation to such a complaint. Disciplinary action will be taken against you if the Council has good reason to think that you may have victimised the complainant or someone else.
- 8.5 If the complaint against you is not upheld, Human Resources will support you, the complainant and your manager(s) in making arrangements for you both to continue or resume working and to help repair working relationships.
- 8.6 Some types of bullying or harassment may constitute unlawful discrimination and allegations may give rise to the possibility of other civil claims or criminal proceedings against you, which would proceed independently of the Council's disciplinary proceedings. You could be personally liable to pay compensation to the complainant if a successful claim in the employment tribunal or other courts was brought against you. Criminal proceedings could lead to conviction and criminal penalties.

9. MAKING THIS POLICY WORK

- 9.1 The Council will provide training to employees and others engaged to work at the Council to help them understand their rights and responsibilities under this policy and what they can do to help create a working environment free of bullying and harassment. We will provide additional training to managers to enable them to effectively prevent and address issues relating to bullying, harassment and victimisation.
- 9.2 The Council will review the outcomes of cases where complaints of bullying and harassment have been made to check that the proper procedures have been followed and to identify any points that can be learned from those cases and implement any necessary changes, to prevent bullying and harassment from happening in the future.
- 9.3 The Council will also periodically monitor how successful it is being in creating a workplace free of bullying and harassment by other means which may include confidential staff surveys.

10. RESOLVING PROBLEMS

- 10.1 If you have any concerns about this policy or the application of it, please speak to your manager in the first instance, who will work with you to resolve any issues. If you are unsatisfied with informal resolutions to your concerns, please refer to the Grievance Procedure for further details about how to raise a grievance.
- 10.2 If you need this information in another format, please contact your manager.

Appendix 1 – Examples of Bullying, Harassment and Victimisation

The following are examples of unacceptable behaviour covered by this policy. This list is not exhaustive or exclusive.

BULLYING

- Verbal abuse (including shouting or swearing) and/or physical intimidation.
- Spreading malicious rumours about colleagues, and/or making negative comments about colleagues to other co-workers (bullying by undermining)
- Giving negative feedback to a colleague in front of others, which may cause humiliation
- Excluding individuals from group activities.
- Persistent unwarranted criticism of personal conduct or job performance.
- Deliberately engineering situations to discredit or undermine job performance.
- Withholding information with the intent of affecting job performance.
- Persistently setting unreasonable objectives / deadlines or unachievable tasks.
- Repeatedly refusing or ignoring reasonable requests without good reason.
- Demeaning comments about a person's appearance.

HARASSMENT RELATED TO A PROTECTED CHARACTERISTIC

- Unwelcome banter, jokes, comments or other behaviours in relation to any of the following protected characteristics: sex, race, religion or belief, disability, sexual orientation, age, gender reassignment
- Isolation or exclusion because of a protected characteristic.
- Labelling or stereotyping at the expense of an individual's disability or the disabled group to which they belong. Use of names, descriptions, or stereotypes that are offensive or insulting.
- Publication, transmission, duplication or display of written or pictorial material related to a protected characteristic that is likely to cause offence.
- Other behaviour related to an individual's protected characteristic that interferes with job performance, undermines job security or creates a threatening or intimidating workplace environment.

SEXUAL HARASSMENT

- Sexualised or obscene jokes, gestures and comments. Casual sexism and banter.
 Including via messaging apps, social media, and at social events, training & conferences.
- Assault, or physical contact, e.g. unnecessary touching, patting or brushing against another person's body, or other unwelcome sexual advances or demands.
- Displaying or sending sexually graphic pictures, photographs or text messages.
- Suggestive looks, staring or leering. Propositions and sexual advances. Making promises in return for sexual favours.
- Intrusive questions about a person's private or sex life or a person discussing their own sex life. Spreading sexual rumours about a person.

LESS FAVOURABLE TREATMENT FOR REJECTING OR SUBMITTING TO SEXUAL HARASSMENT

- Being excluded from training, promotions, work activities or social events after rejecting or submitting to sexual harassment
- Being bullied for this reason, as defined above.

VICTIMISATION

- Isolating or ignoring someone because they made a complaint about discrimination or harassment.
- Bullying behaviour towards someone who has supported a colleague to make a complaint about discrimination or harassment.
- Making threats towards someone who provided witness evidence to an investigation into harassment or discrimination.

Appendix 2 – Investigating Claims of Bullying and Harassment

The Council is committed to providing a working environment for all its staff that is comfortable and free from all forms of bullying and harassment.

Individuals are encouraged to report any incidents of bullying or harassment that they experience or witness so that the Council can investigate and resolve the matter. The Council will take all such complaints seriously.

If the Council has grounds to believe that an employee may have been bullying or harassing another employee, whether or not there has been a formal complaint, the Council will instigate an investigation into the alleged bullying or harassment.

CONFIDENTIALITY

The Council will treat complaints of bullying, harassment and/or victimisation sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis. For example, the nature of the allegations must be revealed to the person complained about, so they are able to respond to the allegations. Some details may also have to be given to potential witnesses, but the importance of confidentiality will be emphasised to them.

If the complaint is upheld, and a person who has been found to have bullied and/or harassed you is kept in the Council's employment, managers may need to be given some information where this is necessary for them to manage the risk of further harassment by that person against you or others.

RISK ASSESSMENT AND TEMPORARY CONTROL MEASURES

If required, the Council may conduct a risk assessment prior to commencing the investigation, to identify any risks to the health and safety of those involved, Council operations, service users and/or any other risks.

Depending on the outcome of the risk assessment, the Council may put in place temporary control measures to manage risk during the investigation. This may include a temporary change working arrangements during the investigation, for example separation of the parties on a "no blame basis".

The Council reserves the right to suspend or temporarily redeploy either the employee suspected of bullying or harassment or the employee raising a complaint of bullying or harassment during the investigations, if it is considered in the interests of the individual(s) or the Council to do so. Suspension in these circumstances does not constitute disciplinary action and will be on full pay.

WELLBEING SUPPORT

We recognise that investigations into bullying and harassment allegations are stressful, for both the complainant and the person complained of. Individuals will be offered wellbeing support by a nominated manager, signposting and/or referrals to sources of additional support.

All parties will be kept informed about progress of the investigation.

INVESTIGATION METHODOLOGY

As part of its investigations, the Council will:

- check whether the person suspected of bullying or harassment has received previous warnings for similar misconduct (or other types of misconduct) and, if so, whether any earlier warnings are active;
- talk in confidence to any persons who may have evidence relating to the employee's alleged behaviour;
- set up an interview with the person alleged to have bullied or harassed a colleague, allowing their the right to be accompanied at the interview;
- allow the person a full and fair opportunity to answer any allegations against them and/or explain their conduct;
- assess objectively whether the person's conduct appears to have amounted to bullying or harassment;
- adopt an objective and balanced approach to the information gained as a result of the investigation;
- avoid allowing personal views about the person to influence the overall assessment of the conduct under review; and
- keep confidential records of the investigation and ensure that these are handled in accordance with the Data Protection Act 1998.

OUTCOMES OF THE INVESTIGATION

As soon as possible following the conclusion of the investigation, the Council will inform the person suspected of bullying or harassment as to the outcome. The Council will decide at that point whether or not it is appropriate to instigate disciplinary action against them.

APPENDIX 3: RISK ASSESSMENT FOR THE PREVENTION OF SEXUAL HARASSMENT

1. GAIN AN UNDERSTANDING OF SCENARIOS AND SITUATIONS WHEN WORKERS MAY BE SUBJECT TO SEXUAL HARASSMENT IN THE COURSE OF THEIR EMPLOYMENT.

To assist managers to identify possible risks and factors in the workplace which could increase the likelihood of an employee or other worker experiencing sexual harassment at work, please review the following risk factors:

Risk Factor	Risk details	Why This is a Risk Factor for Harassment	Risk Factor-Specific Strategies to Reduce Harassment*
Institutional climate or	Sexual harassment is tolerated or	Sexual harassment goes unchallenged, and is	Cultural change through policy updates,
culture which tolerates	seen as inevitable in the	perpetuated by the ongoing acceptance of it.	training, regular reinforcement of standards,
sexual harassment	workplace, and becomes the		senior leadership on the issue and rigorous
	norm.		application of the policies in addressing incidences of sexual harassment.
Homogenous	Historic lack of diversity in the	Employees in the minority can feel isolated	Increase diversity at all levels of the
workforce	workplace	and may actually be, or at least appear to be, vulnerable to pressure from others.	workforce, with particular attention to work groups with low diversity.
	Currently only one minority in a		
	work group (<i>e.g.,</i> team,	Employees in the majority might feel	Pay attention to relations among and within
	department, location)	threatened by those they perceive as	work groups.
		"different" or "other," or might simply be	
		uncomfortable around others who are not	
		like them.	
Workplaces where	"Rough and tumble" or single-sex-	Employees may be viewed as weak or	Proactively and intentionally create a culture
some employees do	dominated workplace cultures	susceptible to abuse.	of civility and respect with the involvement
not conform to			of the highest levels of leadership.
-	Remarks, jokes, or banter that are		
	crude, "raunchy," or demeaning		

Risk Factor	Risk details	Why This is a Risk Factor for Harassment	Risk Factor-Specific Strategies to Reduce Harassment*
		Abusive remarks or humour may promote workplace norms that devalue certain types of individuals.	Pay attention to relations among and within work groups.
Cultural and language differences in the workplace	Arrival of new employees with different cultures or nationalities Segregation of employees with	Different cultural backgrounds may make employees less aware of laws and workplace norms.	Ensure that culturally diverse employees understand laws, workplace norms, and policies.
	different cultures or nationalities	Employees who do not speak English may not know their rights and may be more subject to exploitation.	1
			work groups.
Coarsened Social Discourse Outside the Workplace	Increasingly heated discussion of current events occurring outside the workplace	Coarsened social discourse that is happening outside a workplace may make harassment inside the workplace more likely or perceived as more acceptable.	and local-that are likely to be discussed in
			Remind the workforce of the types of conduct that are unacceptable in the workplace.
Inexperienced workforces	Significant number of inexperienced employees in their first or second job.	be less aware of laws and workplace norms.	Provide orientation to all new employees with emphasis on the employer's desire to hear about all complaints of unwelcome conduct.
		uncomfortable.	Provide training on how to be a good supervisor when employees are promoted to supervisory positions.

Risk Factor	Risk details	Why This is a Risk Factor for Harassment	Risk Factor-Specific Strategies to Reduce Harassment*
		Inexperienced employees may be more susceptible to being taken advantage of by coworkers or superiors, particularly those who may be more senior and more established in their positions.	
		Inexperienced employees may be more likely to engage in harassment because they may not understand or care about consequences.	
Workplaces with "high value" employees	Executives or senior managers Employees with high value (actual or perceived) to the employer,	Management is often reluctant to jeopardize high value employee's economic value to the employer.	
	e.g., the "rainmaking" partner or the prized, grant-winning researcher	High value employees may perceive themselves as exempt from workplace rules or immune from consequences of their misconduct.	
Workplaces with significant power disparities	Low-ranking employees in organisational hierarchy Employees holding positions usually subject to the direction of others, e.g., administrative support staff, nurses, cleaners, etc.	ranking employees. Low-ranking employees are less likely to	Apply workplace rules uniformly, regardless of rank or value to the employer. Pay attention to relations among and within work groups with significant power disparities.

Risk Factor	Risk details	Why This is a Risk Factor for Harassment	Risk Factor-Specific Strategies to Reduce Harassment*
	Gendered power disparities (e.g., most of the low-ranking employees are female)		
Workplaces that rely on customer service or client satisfaction	Compensation directly tied to customer satisfaction or client service	Fear of losing a sale or tip may compel employees to tolerate inappropriate or harassing behaviour.	Be wary of a "customer is always right" mentality in terms of application to unwelcome conduct.
Workplaces where work is monotonous or tasks are low-intensity	Employees are not actively engaged or "have time on their hands"	Harassing behaviour may become a way to vent frustration or avoid boredom.	Consider varying or restructuring job duties or workload to reduce monotony or boredom.
	Repetitive work		Pay attention to relations among and within work groups with monotonous or lowintensity tasks.
Isolated workplaces	Physically isolated workplaces Employees work alone or have few opportunities to interact with others	There are no witnesses.	Consider restructuring work environments and schedules to eliminate isolated conditions. Ensure that workers in isolated work environments understand complaint
			Create opportunities for isolated workers to connect with each other (e.g., in person, on line) to share concerns.
Workplaces that tolerate or encourage alcohol consumption	Alcohol consumption during and around work hours.	Alcohol reduces social inhibitions and impairs judgment.	Train co-workers to intervene appropriately if they observe alcohol-induced misconduct.

Risk Factor	Risk details	Why This is a Risk Factor for Harassment	Risk Factor-Specific Strategies to Reduce Harassment*
			Remind managers about their responsibility if they see harassment, including at events where alcohol is consumed.
			Intervene promptly when customers or clients who have consumed too much alcohol act inappropriately.
Decentralised workplaces	. , , , ,	Managers may feel (or may actually be) unaccountable for their behaviour and may act outside the bounds of workplace rules.	Ensure that compliance training reaches all levels of the organisation, regardless of how geographically dispersed workplaces may be.
	·	Managers may be unaware of how to address harassment issues and may be reluctant to call headquarters for direction.	Ensure that compliance training for area managers includes their responsibility for sites under their jurisdiction
			Develop systems for employees in geographically diverse locations to connect and communicate.