



ATRIUM GROUP

Dignity at Work Policy

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Compliant with Scottish Housing Regulator's Regulatory Framework:	1.2, 1.3, 2.2, 5.1, 5.3, 5.6
Compliant with Tenant Participation Strategy:	N/A
Compliant with Equal Opportunities:	Yes
Compliant with Business Plan:	N/A
Date Approved:	February 2021
Date Reviewed:	May 2025
Staff consulted on changes:	May 2025
Date for Next Review:	May 2030 or earlier if required by changes in legislation or guidance, or if the Governing Body sees fit
Responsible Officer:	Chief Executive

The Dignity at Work Policy has a direct link to the following Atrium policies and procedures:	Terms & Conditions of Employment Codes of Conduct for Staff and Governing Body Members Whistleblowing Policy Equality & Diversity Policy (HR) Privacy Policy Data Retention Policy Unacceptable Actions Policy
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Atrium Group

Dignity at Work Policy

1. Introduction

The Atrium Group (Atrium) is committed to providing a working environment and culture where all employees have the right to be treated with dignity and respect, free from bullying, abuse, harassment, sexual harassment, discrimination and victimisation of any nature.

Every employee, governing body member, agency worker, contractor, and consultant of Atrium has a responsibility to treat anyone who is associated with the work of Atrium with dignity and respect, regardless of any personal characteristic.

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

2. 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 to the Equality Act 2010 which aims to better protect employees from sexual harassment, prioritising prevention.

Public Interest Disclosure Act 1998

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

Health & Safety at Work Act 1974

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

3. 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

Atrium Group

Dignity at Work Policy

individual. Atrium 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 are 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 Appendix 1 – Sexual Harassment for specific information relating 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 are 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
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Atrium Group

Dignity at Work Policy

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 judged by and in line with Atrium's Codes of Conduct and our Unacceptable Actions Policy.

Examples of unacceptable behaviour could include but are 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.

4. Policy Principles

This Dignity at Work Policy aims to:

- Set out standards of behaviour expected for employees, governing body members, agency workers and consultants of Atrium.
 - Ensure that employees, governing body members, 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 Atrium's business.
 - Ensure that all employees, governing body members, agency workers and consultants are treated with respect and dignity from each other.
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Atrium Group

Dignity at Work Policy

- Set clear guidelines and standards regarding treatment of employees by third parties.
- Ensure that all employees, governing body members, agency workers, contractors, and consultants respect the differences within the communities 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.

5. Implementation of Policy

The Chief Executive, along with the Executive Management Team is responsible for the implementation and review of this policy.

Atrium will ensure that all employees, governing body members, agency workers and consultants will receive an induction on this policy. The policy will be integrated into all policies and procedures within Atrium.

Copies of this policy will be issued to all employees, governing body members, agency workers and consultants. Copies of this policy will be issued to all contractors, and will be available to all who request it.

This policy applies to all employees, governing body members, agency workers and consultants of Atrium and therefore all mentioned parties have a responsibility to abide by the principles outlined above and also to alert their line manager or the 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.

6. Roles & Responsibilities

Organisational

Atrium is 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, governing body members, agency workers and consultants.

Atrium Group

Dignity at Work Policy

Employees, Governing Body Members, Agency Workers and Consultants

All employees, governing body members, agency workers and consultants have a personal responsibility to act in line with, observe and uphold this policy, and follow Atrium's Codes of Conduct. All employees, governing body members, 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 has additional responsibilities to ensure:

- They understand their own and the organisational responsibilities.
- They are familiar with the content of the Dignity at Work Policy and communicate this to the relevant people.
- Role model behaviours expected and encourage 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.

Contractors

Atrium expects all contractors and their representatives to comply with the principles of this policy when interacting with our employees, governing body members, agency workers, consultants and customers.

If a contractor or their representative experiences discrimination, harassment, bullying or victimisation in the course of carrying out their duties for Atrium, we would ask that this be reported to a member of the Executive Management Team and we will consider what steps can be taken to try and prevent this happening again.

Depending on the severity of any alleged event, action might be taken in line with the principles of this policy, our Unacceptable Actions Policy and also our Codes of Conduct for Staff and Board, our Terms & Conditions of Employment for staff, and other relevant policies. This may therefore result in termination of a contract with Atrium.

7. Procedure in Dealing with breaches of Dignity & Respect

This procedure is complemented by Atrium's Equality & Diversity Policy (HR), and Discipline & Grievance procedures included in Atrium's Terms & Conditions of Employment.

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

Atrium Group

Dignity at Work Policy

7.1. 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:

- a) In the first instance alert their line manager to the behaviour.
- b) Thereafter the employee should be encouraged by the line manager and with their support to 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.
- c) Should it be determined that there has been a breach of policy, a note should then be put on file of the person who has displayed the inappropriate behaviour and the individual that raised the issue.

7.2. 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 Atrium's grievance procedure.

- a) The employee must put their concerns in writing and give this to their line manager.
- b) 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.
- c) The manager should then conduct any necessary investigations. No investigation should take place prior to there being a meeting with the employee.
- d) 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 member of staff which will be managed through Atrium's disciplinary procedure; or
 - Learning is identified to be actioned on an organisational basis.

Where action is taken regarding a member of staff, governing body member, agency worker or consultant other than the person who raised the complaint,

Atrium Group

Dignity at Work Policy

the complainant will not be informed of any action taken against other individuals.

8. 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.

Atrium staff have access to a 24-hour advice and information line through the Westfield Health Cash Plan which we subscribe to for all staff.

Call 0800 092 0987 and quote the scheme reference CHAMCOL2 / Company Account Number 16696

9. Malicious Allegations

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

10. General Data Protection Regulations

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

Atrium Group

Dignity at Work Policy

Appendix 1 – Sexual Harassment

Introduction

Atrium is committed to providing a positive experience whilst at work for all our employees, governing body members, agency workers and consultants, which includes a zero-tolerance approach to sexual harassment.

This appendix sets out Atrium's expectations of behaviour by employees, governing body members, agency workers and consultants, and provides information on how we will deal with complaints of sexual harassment.

Definitions

The Equality Act 2010 defines sexual harassment as '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'. Sexual Harassment is unlawful under the Equality Act 2010. It is also unlawful to treat someone less favourably because they have submitted a complaint of sexual harassment or have rejected such a behaviour.

Sexual harassment includes a wide range of behaviours including but not limited to:

- Making sexual remarks about a colleague's body, clothing or appearance
- Suggestive looks, staring, or leering
- Propositions and sexual advances
- Sexual gestures
- Emailing, texting or messaging sexual content
- Unwelcome touching, hugging, massaging or kissing
- Sexual comments or offensive jokes
- Making sexual comments or jokes about someone's sexual orientation or gender reassignment
- Displaying or sharing sexually graphic images, or other sexual content
- Criminal behaviour, including sexual assault, stalking, grooming, indecent exposure and sending offensive communications

Sexual harassment can be a singular event or something that is an ongoing pattern of behaviour. Sexual harassment may be physical, verbal or non-verbal conduct. It can occur face to face or can be done by email, phone calls, online and on social media.

Sexual harassment may occur at work or outside work.

Sexual conduct that has been welcomed previously can become unwanted. The person in receipt of the behaviour decides whether it is unwanted. An individual can experience sexual harassment from someone of the same or different sex.

Sexual interactions that are invited, mutual and consensual are not considered to be sexual harassment.

Behaviour expectations

Atrium expects you to follow the expectations as set out in the Codes of Conduct. Any Sexual Harassment by employees towards others in connection with work will be considered under the Disciplinary & Grievance procedures in Atrium's Terms & Conditions of

Atrium Group

Dignity at Work Policy

Appendix 1 – Sexual Harassment

Employment, and action taken under this policy can include dismissal. Sexual harassment may constitute gross misconduct and may result in dismissal.

Preventative Duties

The Worker Protection Act 2023 (Amendment of the Equality Act 2010) requires employers to take reasonable steps to prevent sexual harassment. Atrium has taken preventative steps to ensure a workplace free from any sexual harassment. In addition to this policy, a risk assessment has been completed to assess the risks and preventative steps include:

- Engaging with the staff team on what is required of them
- Ensuring employees have signed up to and understand Atrium's Terms & Conditions of Employment
- Ensuring Board confirm their commitment to the Code of Conduct annually
- Ensuring Contractors have been made aware of this policy by being sent a copy
- Dealing with employee, customer and other third party complaints – to be handled in accordance with Stage 2 procedures, to be managed by senior management
- Monitor and evaluate policy and complaints – learning from incidents, reviewing policy regularly, reviewing trends on complaints and taking action to rectify cultural concerns
- Reporting – effective reporting procedure, anonymous complaints process, communication of this process

Reporting procedure & dealing with all sexual harassment complaints

Allegations should always be taken seriously, and action taken as quickly as possible to stop any further inappropriate behaviour identified. Where possible, breaches of this policy should be dealt with informally in the first instance. Dependant on the serious nature of some complaints together with the risk to the safety of the complainant and others, we may need to take formal action immediately.

Informal stage

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 Atrium'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.
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Atrium Group

Dignity at Work Policy

Appendix 1 – Sexual Harassment

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 Atrium's disciplinary procedure.
 - Learning is identified to be actioned on an organisational basis.

Where action is required against another employee, governing body member, agency worker or consultant, this will follow the organisation's disciplinary procedures. Where action is taken regarding a member of staff other than the person who raised the complaint, the complainant will not be informed of any action taken against other individuals.

Anonymous complaint

We may receive anonymous allegations of sexual harassment through the "Whistle-blowing Policy". While we recognise that it can be difficult to investigate such complaints, Atrium will conduct as thorough an investigation as possible, given the information available. This will always include informing the accused person that a complaint has been received about them.

Third Party Sexual Harassment

Atrium will also take reasonable steps to prevent any sexual harassment by third parties, as required by the Worker Protection Act 2023. A third party can be a customer, consultant, contractor or visitor.

Employees, governing body members, agency workers and consultants are encouraged to report any sexual harassment, which may involve a third party.

Atrium will follow the process as detailed within the 'Procedure in Dealing with breaches of Dignity & Respect' section.

When a complaint is received Atrium will ensure that steps are taken to protect the individual raising the complaint. Atrium will take steps to remedy a complaint and action to prevent this from happening again.

Examples of action Atrium may take, but not limited to are:

- Taking action under the Unacceptable Actions Policy.
- Reporting any criminal acts to the police.
- Sharing information with other parts of the business.

Atrium Group

Dignity at Work Policy

Appendix 1 – Sexual Harassment

Support for those affected or involved

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

In addition to being able to speak to senior managers, Atrium staff have access to a 24-hour advice and information line through the Westfield Health Cash Plan which we subscribe to for all staff.

Call 0800 092 0987 and quote the scheme ref CHAMCOL2 / Company Acc No 16696

Witness to unwanted conduct of sexual nature

Tackling sexual harassment is everybody's responsibility. You do not have to be the recipient or target of sexual harassment to raise a concern or make a complaint. If you see it happening or become aware of it, you should report it in line with the 'Procedure in Dealing with breaches of Dignity & Respect' section if you feel able to do so.

Your actions can be important in helping create a culture free from sexual harassment.

Individuals found to be in breach of the principles of this policy

Where individuals are found to be in breach of this policy whether that be employees, governing body members, agency workers or consultants this will be dealt with in accordance with Atrium's Codes of Conduct, Disciplinary and Grievance procedures and other relevant policies. This may result in disciplinary action up to and including dismissal.

General Data Protection Regulations

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