



## **Anti-Harassment and Bullying Policy**

Harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable.

Personal harassment takes many forms ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. For the purposes of this policy, it also includes bullying. Whatever form it takes, personal harassment is always taken seriously at Track Academy and is totally unacceptable.

Track Academy recognises that personal harassment can exist in the workplace, as well as outside, and that this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating and unpleasant working environment.

Track Academy deplores all forms of personal harassment and seeks to ensure that the working environment is sympathetic to all our employees. The aim of this policy is to inform employees of the type of behaviour that is unacceptable and provide employees who are the victims of personal harassment with a means of redress.

Track Academy recognises that we have a duty to implement this policy and all employees are expected to comply with it.

### **A) Examples of Personal Harassment**

Personal harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one employee towards another and examples of harassment include:

- insensitive jokes and pranks
- lewd or abusive comments
- deliberate exclusion from conversations
- displaying abusive or offensive writing or material
- abusive, threatening or insulting words or behaviour
- name-calling
- picking on someone or setting them up to fail
- exclusion or victimisation
- undermining their contribution/position
- demanding a greater work output than is reasonably feasible
- blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.



### Third Party Harassment

#### Purpose:

Track Academy is committed to providing a safe and respectful working environment for all employees. This includes protecting employees from harassment, intimidation, or inappropriate conduct by third parties, such as clients, customers, suppliers, contractors, or visitors.

#### Policy:

Employees have the right to work free from harassment by third parties. Harassment includes any unwanted conduct, whether verbal, physical, or visual, that violates a person's dignity, creates an intimidating, hostile, degrading, humiliating, or offensive environment, or is discriminatory in nature.

#### Examples of Third-Party Harassment Include:

- Offensive or discriminatory comments or language
- Threats, intimidation, or aggressive behaviour
- Unwanted physical contact or invasion of personal space
- Any conduct that could reasonably be perceived as hostile or abusive

#### Employee Responsibilities:

Employees should report any incident of harassment by a third party as soon as possible to their manager, HR department, or via the company's formal reporting procedures. Reports will be treated seriously, confidentially, and investigated promptly.

#### Company Responsibilities:

Track Academy will:

- Take all reasonable steps to protect employees from third-party harassment
- Investigate reported incidents thoroughly and impartially
- Take appropriate action against third parties, which may include warning, restricting access, terminating contracts, or involving law enforcement if necessary
- Support employees affected by third-party harassment, including providing guidance, counselling, or other assistance as required

#### No Retaliation:

Employees who report third-party harassment in good faith will be protected from any form of retaliation or victimisation.

### B) Examples of Sexual Harassment

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:



- lewd or abusive comments of a sexual nature such as regarding an individual's appearance or body
- unwelcome touching of a sexual nature
- displaying sexually suggestive or sexually offensive writing or material
- asking questions of a sexual nature
- sexual propositions or advances, whether made in writing or verbally.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature. Whether less favourable treatment occurs as a result will be examined broadly and includes areas such as blocking promotion and refusal of training opportunities or other development opportunities.

### C) Responsibilities

#### *Employee responsibilities*

Track Academy requires its employees to behave appropriately and professionally at all times during the working day, and this may extend to events outside of working hours which are classed as work-related such as social events. Employees should not engage in discriminatory, harassing or aggressive behaviour towards any other person at any time. A breach of this policy by will be treated as a disciplinary manner

#### *Employer responsibilities*

Track Academy will be responsible for ensuring all members of staff, including seniors and those within management positions, understand the rules and policies relating to the prevention of harassing and bullying behaviour at work and during work-related social events. We will promote a professional and positive workplace whereby managers are alert and proactively identify areas of risk and incidents of harassment, sexual harassment and bullying.

Where an incident is witnessed, or a complaint is made under this policy, Track Academy will take prompt action to deal with this matter. All incidents will be deemed serious and dealt with in a sensitive and confidential manner.

### D) Complaining about Harassment and/or Bullying

#### *Informal method*

Track Academy recognises that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper.

If you are the victim of minor harassment you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If



you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

### *Formal method*

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of Connie Henry, Founder and Director as a formal written grievance and again your confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment
- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by you to stop the alleged harassment.

Where it is not possible to make the formal complaint to the above named person, for example where they are the alleged harasser, we would encourage you to raise your complaint to Connie Henry, Founder and Director if appropriate or to a Trustee of Track Academy if more appropriate.

On receipt of a formal complaint Track Academy will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

On conclusion of the investigation which will normally be within 7 working days of the meeting with you, a report of the findings will be submitted to the manager who will hold the grievance meeting.

You will be invited to attend a meeting, at a reasonable time and location, to discuss the matter once the person hearing the grievance has had the opportunity to read the report. You have the right to be accompanied at such a meeting by a colleague and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

You will be able to put your case forward at the meeting and the manager will explain the outcome of the investigation. You have a right to appeal the outcome, which is to be made to Patrik Ewe, Chief Executive Officer if appropriate or to a Trustee of Track Academy if more appropriate. Within 7 days of receiving the outcome.

If the decision is that the allegation is well-founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure.

Track Academy is committed to ensuring employees are not discouraged from using this procedure and no employee will be victimised for having brought a complaint.



### Report a Harassment Case To:

- Primary Contact: Patrik Ewe, Chief Executive Officer
- Alternative Contact (in the CEO's absence): Frederik Rayneart, Chairperson of Track Academy (to be confirmed)

### New change in law:

From 26th October 2024 there is a change in law that will put a new duty on employers to take reasonable steps to prevent sexual harassment. This will require a risk assessment and from the risk assessment you will need to create a sexual harassment policy. Please see separate sexual harassment policy.

Signed by CEO of Track Academy:

Name: Patrik Ewe

Date signed: 10 April 2026