THE MOVIE LOT
GROUP

Bullying & Anti-Harassment Policy

@THEMOVIELOT

BULLYING & ANTI-HARASSMENT POLICY

At The Movie Lot Services LTD, we believe that having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and to the organisational environment we wish to protect. We do a lot to support our inclusive culture, and you can read more about this in our Equality, diversity and inclusion (EDI) policy.

This preventing bullying, harassment and sexual harassment policy is core to the Company's commitment and will be applied rigorously. This policy defines what the Company considers to be bullying and harassment which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions.

Employees, workers, contractors, subcontractors, volunteers, interns and apprentices ("Workers") engaged or contracted by or with the Company and third parties such as customers, suppliers or visitors to the Company's premises ("third parties") are responsible for acting in accordance with the standards detailed in this policy and applying to every situation the basic principles of fairness, honesty, integrity, and compliance with the law. Workers must ensure that adherence to these standards and values are given the highest priority within the Company.

Workers and third parties should feel that they are treated with the requisite dignity and respect. Furthermore, we expect our management to act as role models in their business conduct and leadership style. Behaviour that goes against our standard of business ethics will be identified and investigated. This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

This policy applies to anyone working for us: workers and third parties. It also extends to job applicants and applies to all stages of the employment relationship.

What happens if this policy is breached?

Failure to follow this policy may result in disciplinary action. Breaches of the policy may also represent breaches of the law and may result in legal sanctions for the Worker(s), third parties and/or the Company.

Our commitment to you

We are committed to taking proactive measures to prevent all forms of bullying and harassment, including sexual harassment, of our workers by:

• ensuring all new starters attend equality, diversity and inclusion training, sexual harassment training and anti-bullying and anti-harassment training, as part of their onboarding programme;

• requiring all employees to attend regular equality, diversity and inclusion training and anti-bullying and anti-harassment training on at least an annual basis;

• providing additional training for line managers to ensure that they understand how to implement this policy effectively and their role in preventing and stopping bullying and any type of harassment from occurring in the workplace and by third parties that they may have contact with;

• monitoring our workplace culture through anonymous surveys, exit interviews, one-to-one conversations, return-to-work meetings and employee resource groups to identify and address any issues;

• undertaking regular risk assessments to determine reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace and by third parties that they may have contact with; and

• ensuring that our zero approach to all forms of discrimination, and bullying and harassment, is communicated to all workers and third parties that we may have contact with.

What we expect from you

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying this policy. Whatever your job is, this is part of your role.

You should be aware that you can be personally liable for harassment.

What is considered bullying?

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work. Bullying may include, by way of example:

• Physical or psychological threats;

• Overbearing and intimidating levels of supervision;

• Inappropriate derogatory remarks about someone's performance.

It is important to understand that legitimate, reasonable and constructive criticism of a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to bullying

Upward bullying

Bullying is not always directed from a more senior individual towards someone in a lower position. In some cases, it can happen the other way around, where staff members target a manager or someone in a leadership role. This is sometimes referred to as 'upward bullying' or 'subordinate bullying'.

This type of behaviour may come from a single employee or a group of employees acting together. It can be particularly challenging for someone in a senior position to recognise that they are being subjected to bullying by their staff, as leadership roles often involve managing difficult situations or dealing with resistance to decisions.

Examples of upward bullying

• Persistently showing a lack of respect towards a senior figure

• Refusing to follow instructions or complete assigned tasks

• Spreading rumours or making false accusations to undermine credibility

• Constantly challenging or undermining a leader's authority in a disruptive manner

• Engaging in behaviour designed to make a manager appear incompetent or incapable of fulfilling their responsibilities

• Repeatedly questioning decisions in a way that is intended to cause embarrassment or loss of control

What is considered harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. Unlawful harassment may involve conduct of a sexual nature or it may be related to race, colour, nationality, marital or civil partner status, pregnancy or maternity, disability, gender re assignment, religion or belief, ethnic or national origin, sexual orientation or age. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may take many forms and include:

• conduct which is unwanted by the recipient and perceived as hostile or threatening;

• conduct which gives rise to a hostile or threatening work environment;

• conduct which creates an atmosphere in which it is feared that rejection or submission will be used as a basis for decisions which have an impact on the recipient at work.

The following are examples but not limited of types of behaviour which may amount to harassment:

• Making threats, whether direct or implied, that cause a person distress, fear, or anxiety

• Intruding on a person's privacy or personal space in a way that makes them feel uncomfortable

• Making derogatory or offensive jokes or comments about someone's background, beliefs, disability, gender, or other protected characteristics

• Treating someone unfairly or unequally based on factors such as age, race, disability, faith, or socioeconomic background

• Using gestures, facial expressions, or non-verbal cues to intimidate, mock, or degrade someone

• Deliberately excluding someone from opportunities or participation based on prejudice rather than merit or role suitability

• Targeting someone with repeated, unwarranted scrutiny or criticism based on their identity rather than their actions

• Refusing to accommodate reasonable adjustments for individuals with disabilities in a way that obstructs their ability to participate

Sexual harassment

Sexual harassment is any unwanted behaviour of a sexual nature that makes a person feel uncomfortable, distressed, or intimidated. Under the Equality Act 2010, this behaviour is unlawful, and it is completely unacceptable.

While this is not an exhaustive list, examples include

• physical conduct of a sexual nature, unwelcome physical contact or intimidation;

• persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;

• showing or sending offensive or pornographic material by any means (e.g. by text, video clip, email or by posting on the internet or social media);

• unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;

• offensive comments about appearance or dress, innuendo or lewd comments;

• leering, whistling or making sexually suggestive gestures; and

• gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

Microaggressions

Microaggressions are statements, actions, or incidents that are regarded as indirect, subtle, or unintentional discrimination against members of a marginalised group such as a racial or ethnic minority. Microaggressions generally take one of three forms:

• Micro-assaults: Conscious and obvious insults made verbally or non-verbally to a marginalised individual or group, for example directing limp-wristed hand gestures towards a gay colleague and saying "It's just a joke".

• Micro-insults: Unintentionally insensitive remarks or assumptions based on stereotypes, for example saying to a person with a disability "You don't look disabled to me".

• Micro-invalidations: Where a person denies, or seeks to cancel, the feelings and lived experiences of a marginalised individual or group, for example a white person saying "I don't think the UK has a problem with racism - some people are just too sensitive".

Serious microaggressions can amount to unlawful harassment, bullying or discrimination but even less serious microaggressions can negatively impact the health and wellbeing of the person experiencing them.

How I will be protected and supported?

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you feel uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager or Human Resources, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter under the Company's Grievance Procedure. Where harassment is found to have occurred this will amount to misconduct or gross misconduct.

No one who makes an allegation of harassment in good faith should be subjected to any detriment as a result. If you believe that you have suffered any such treatment, you should report it immediately..

"Good faith" does not mean that a reported concern must be accurate, but it does require the individual to be honest when reporting it. The Company aims to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Retaliation against someone or the victimisation of someone who reports a problem in good faith may result in sanctions against the retaliator, up to and including termination of their contract with the Company.

False allegations are a serious matter. The behaviour of anyone who is found to have made an unfounded, deliberately malicious complaint or allegation will be subject to disciplinary action.

What happens if I raise a concern?

The Company will usually arrange a meeting as soon as possible to discuss your concern. You will be allowed to bring a colleague or trade union representative to any meetings. Any companion must respect the confidentiality of the disclosure(s) and any subsequent investigation.

Information about a complaint by or about a Worker may be placed on the individual's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with the Company's Privacy Policy / Data Protection Policy.

Will my concern be treated confidentially?

The company will inform everyone involved in an informal or formal complaint about bullying or harassment, including witnesses, that they must maintain strict confidentiality and handle the matter with appropriate sensitivity toward all parties.

If an individual is found to have breached confidentiality or acted without due care or sensitivity in such a case, the company may take disciplinary action, up to and including dismissal, or implement other appropriate measures for non-employees. You can raise concerns anonymously; however, this may limit the ability to fully investigate the matter. If you wish to make an anonymous complaint, please refer to the Company Whistleblowing Policy, which provides guidance on how to report concerns confidentially and the protections available for whistleblowers.

Anonymous complaints will still be taken seriously, but providing some level of detail can help ensure the matter is properly addressed. If you are concerned about potential retaliation, steps will be taken to protect you, and any form of victimisation will not be tolerated.

Why we apply this policy?

It is our wish to set a standard in the industry where people are treated fairly and as equals and where everyone should experience a safe work environment. The Company is committed to creating a working environment of mutual trust and respect with support for cultural diversity, an open and honest team. Co-operation and an environment free of intimidation, fear and harassment form the basics of our corporate culture.

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

We 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.

Consequences of breaching this policy

If, following a formal investigation, we find that you have committed, authorised or condoned an act of bullying or harassment, we will deal with the issue as a possible case of misconduct or gross misconduct.

We may take disciplinary action against you, up to and including dismissal (or other appropriate action for non-employees). You should be aware that any aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take.

Anyone who complains or takes part in good faith in a bullying or harassment investigation must not suffer any form of detrimental treatment or victimisation. If we find that you have victimised anyone in this way, we will instigate disciplinary action against you up to and including dismissal (or other appropriate action for non-employees).

If you are an employee, please refer to our Disciplinary procedure for further information.

Record-keeping

We process personal data collected in relation to bullying or harassment complaints in accordance with our data protection policy. In particular, data collected in relation to the investigation of bullying or harassment complaints is held securely and accessed by, and disclosed to, individuals only for the purposes of responding to the complaints and conducting an investigation. You should immediately report any inappropriate access or disclosure of employee data in accordance with our Data protection policy as this constitutes a data protection breach. It may also constitute a disciplinary offence, which we will deal with under our disciplinary procedure.

Monitoring and review

This policy is reviewed annually and, if necessary, amended to ensure that it remains effective. We analyse data around allegations of bullying or harassment (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our wider equality, diversity, and inclusion strategy.

To raise a concern, you can email The Movie Lot directly at: hello@themovielot.co.uk

You can also contact the following helpline for free advice and support:

The Film & TV Charity
0800 054 0000