# DIGNITY AT WORK POLICY AND PROCEDURE (including anti-harassment)

## NOVEMBER 2026

## INTRODUCTION

As a company, we want to have a working environment that is welcoming and provides a positive experience for all our people and ensures their mental and physical wellbeing.

This policy sets out our intention that everyone should be treated with dignity and respect, embracing all people irrespective of any personal characteristic, responsibility or other need. We are committed to giving equal access to all and removing barriers or intolerance for all. Our primary focus is on the ability for colleagues from all backgrounds to be themselves in the workplace, to be valued for their contributions, to give their best, and to develop their careers.

Individuals who work for us, or who want to work for us will be welcomed, valued, treated fairly and respected for their individuality and will be able to bring value to the organisation by virtue of their differences.

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## 1. PURPOSE

1.1 The Company is committed to creating a positive working environment in which our people, and everyone they deal with, are treated fairly and with dignity and respect.

1.2 Behaviour that jeopardises dignity at work is not acceptable and will not be tolerated; the Company has a zero tolerance approach to such behaviour. Whether it happens once or is ongoing, such behaviour may lead to disciplinary action up to and including dismissal without notice. In disciplinary matters, aggravating factors such as abuse of power will be factored into decision making. For clarity, some behaviour (such as sexual harassment) is unlawful and could be a criminal offence.

1.3 The Company specifically prohibits and seeks to eradicate any discrimination, harassment, bullying, victimisation or unfair treatment against any individual on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, caring responsibilities, ex-offender status, relationship status, family responsibilities or political opinion. The law requires the Company to take reasonable steps to prevent issues of this type, including our duty to take all reasonable steps to prevent sexual harassment at work, by both employees and third parties. However, our aim is to set a higher standard of acceptable behaviour than the law requires.

1.4 This policy provides examples of the types of behaviour which may be unacceptable and sets out the way in which concerns about unacceptable behaviour can be raised along with our overall approach to dignity at work and preventing harassment.

## 2. SCOPE

2.1 This is a group level policy that applies to all employees of Anglian Water Group Limited and its subsidiaries (including but not limited to Alpheus Environmental Limited, AVH Parks Limited, TIDE Services Limited and AWG Group Limited) but excluding Anglian Water (Ireland) Limited and Wave Limited (and their respective subsidiaries, which include Celtic Anglian Water Limited and Anglian Water Business (National) Limited).

2.2 The policy covers employees on Company business of any kind, on Company or customer premises and at any Company-related social activities whether during working hours or not. It applies to both the behaviour and treatment by employees towards/of other employees, customers, agency workers or contractors and third parties. It also covers social media or similar activities where the Company considers that they impact on work even if they take place outside of working hours or using personal equipment.

2.3 Agency workers, contractors and third parties who carry out work for or with the Company are expected to treat others with respect and dignity. Issues of potential poor behaviour/treatment will be reported to the relevant employer or Company contact as appropriate. Where an employee experiences behaviour from a third party that is, or may be, harassment (including sexual harassment), the Company will deal with the matter in line with Section 7 of this policy.

2.4 Concerns from agency workers, contractors and third parties need to be raised with their own employer or Company contact as appropriate.

2.5 The Company may take disciplinary action, up to and including dismissal, where harassment or victimisation takes place:

- at work;
- in a work-related setting, such as a social event with colleagues;
- outside work towards a colleague or another person connected with the Company, including on social media; or
- outside work in circumstances that are relevant to an employee's suitability for their role.

## 3. STATUS

3.1 This policy and procedure is subject to regular review by the Company and is updated as appropriate.

## 4. POLICY OWNER

4.1 Head of People Business Partnering.

## 5. POLICY

5.1 The Company is committed to creating an environment where all employees feel included and valued in order to achieve their full potential. We promote equality and fairness by valuing diversity in the workplace.

5.2 To help create a positive working environment and to ensure that our people, and everyone they deal with, are treated fairly and with dignity and respect, the Company requires all its employees to undertake mandatory Dignity at Work training, available through Workday. The training includes how to recognise and respond appropriately to sexual harassment, including harassment by third parties. The Company regularly reviews and refreshes the training to ensure that it remains effective and reflects current legal requirements.

5.3 The Company recognises that nevertheless, sometimes behaviour will fall short of acceptable standards. The Company will take action to tackle all behaviour that is unreasonable or offensive, including behaviour that may amount to discrimination, harassment, bullying or victimisation (as defined in **Appendix 1**).

5.4 All employees have an obligation to treat colleagues and customers with respect and dignity. Employees must think about their own behaviour and ensure that it does not upset or offend others. What is acceptable to one person may be unacceptable to someone else, even if no offence is intended.

5.5 All employees have an obligation to behave positively and to challenge and/or report unacceptable behaviour, even if it is not directed at them. Leaders are expected to be particularly proactive in managing such behaviour when they witness it or become aware of it, whether or not a concern has been raised with them. Managers receive specific training on how to respond to, escalate and report concerns, including concerns about sexual harassment and the behaviours set out within this Policy.

5.6 Employees who witness harassment, bullying or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

- intervening where they feel able to do so;
- supporting the person affected to raise a concern, or raising it on their behalf;
- reporting the behaviour where there may be an ongoing risk; and
- cooperating with any investigation into what happened.

5.7 The Company will support employees who come forward as witnesses and will not tolerate victimisation as a result of raising or supporting a concern.

5.8 Concerns raised in good faith will always be treated seriously and with sensitivity. No employee will be disciplined or victimised for raising a concern in good faith. However, action may be taken under the Company's Disciplinary Procedure where concerns are raised maliciously, are vexatious or are not true.

5.9 All concerns raised will be handled in confidence as far as possible. However, employees must be aware that sometimes confidentiality cannot be guaranteed, for example, information may need to be shared in order for a concern to be dealt with or investigated. Breach of the confidentiality obligations in this policy may lead to disciplinary action under the Company's Disciplinary Procedure.

5.10 Employees raising concerns, supporting colleagues who have raised concerns, those who are the subject of the concerns or who are involved in an investigation are expected to behave in a professional manner at all times. In particular, employees are expected not to discuss the matter with anyone except their Line Manager, Employee Relations Manager/Advisor (ERA/ERM) or trade union representative/nominated work colleague.

5.11 Sometimes employees may find requests, decisions or actions to be unwelcome or uncomfortable. Examples may include the allocation of work, management of performance/attendance/conduct (e.g. being issued with a performance improvement plan, an improvement notice for sick absence or a disciplinary warning), provision of feedback, or an unsuccessful promotion application. Legitimate requests, decisions or action carried out in a reasonable and respectful manner and in accordance with the Company's policies, procedures or usual practices will **not** be considered to amount to unacceptable behaviour.

## 6. PROCEDURE

6.1 Informal Steps

6.1.1 It is always advisable to take steps to resolve concerns as soon as possible. Many issues can be resolved quickly and effectively by discussion at an early stage.

6.1.2 If an employee feels able to, it is often helpful for them to explain directly to the person whose behaviour they find unacceptable the effect that their behaviour is having on them, and politely ask them to stop. The person may be unaware of the effect of their behaviour and this feedback may be enough to resolve the issue.

6.1.3 If an employee is unsure whether behaviour they have experienced or witnessed amounts to bullying or harassment, they can speak informally and confidentially with their line manager or ERM/ERA for advice.

6.1.4 If a colleague informs an employee that their behaviour is unacceptable to them, the employee should try not to react defensively. The employee should listen to what the colleague has to say, ask for clarification if necessary and think about their point of view, asking them for time to think about what they have said if they need to. Often a simple acknowledgement that the behaviour has affected, even if no offence was intended, and agreement not to continue the behaviour is enough to resolve the situation.

6.2 Formal Complaints

6..2.1 If an employee feels unable to address the behaviour they find unacceptable directly with the person concerned, or the behaviour continues, they may take action under the Company's Grievance Procedure. A link to the procedure can be found on Lighthouse. Alternatively, an employee may raise their concerns directly with the appropriate ERM/ERA. Details of the areas covered by each ERM/ERA can be accessed here.

6.2.2 Employees wishing to report unacceptable behaviour that they have witnessed against other employees, may use the Company's Whistleblowing line or raise their concerns directly with the appropriate ERM/ERA.

6.2.3 In most cases, it is for the employee to decide whether to make a formal complaint. However, the Company may need to take action even where an employee does not wish to progress the matter, particularly where there are concerns about the safety or wellbeing of others.

6.3 Investigation

6.3.1 The Company will investigate any formal complaints in line with its Grievance Procedure. A link to the procedure can be found on Lighthouse.

6.3.2 It may be necessary to separate employees temporarily while an investigation and any follow up action is ongoing. This will not be appropriate in every case and such decisions will be considered carefully. This could involve, for example, temporary changes to reporting lines, working arrangements or work locations. In some cases, it may be necessary to suspend one or more employees from work. Temporary changes, including suspension, should not be seen as an indication of prejudgement on the part of the Company.

6.3.3 Where the complaint concerns a third party, such as a customer, supplier or visitor, the Company will take appropriate steps to support the complainant and protect employees while the matter is investigated. Where appropriate, the Company may also raise the concerns with the third party.

6.3.4 The Company will consider carefully any request from the complainant for temporary changes to their working arrangements while the investigation takes place. This might include changes to duties or working hours to reduce or avoid contact with the person complained about.

6.3.5 The investigator may need to speak to witnesses as part of the investigation. Anyone involved will be reminded of the importance of keeping the matter confidential.

6.3.6 Once the investigation is complete, an appropriate senior manager will review the findings and usually meet with the complainant within one week to discuss the outcome and any next steps. The complainant can bring a colleague or trade union representative to the meeting. The complainant and the person complained about will receive the investigation findings, with information removed where appropriate to protect the privacy of others.

6.4 Action Following Investigation

6.4.1 If the Company decides that there is a case to answer, subsequent actions will be taken to address where the standards of behaviour fall below our expectations. This will vary depending on the circumstances but may include informal or formal coaching and support, training, an Occupational Health referral and/or performance management or disciplinary action. Only in exceptional cases would the Company consider actions such as permanent changes to reporting lines, working arrangements or work locations. If the complaint is upheld, the complainant will be told, where appropriate, about any action taken in response and any steps put in place to help prevent similar behaviour in the future.

6.4.2 Whether or not the complaint is upheld, the Company will consider whether any steps are needed to support the ongoing working relationship between those involved. This may include mediation or counselling.

6.4.3 Any employee who knowingly provides false information or acts in bad faith during an investigation may be subject to action under the Company's Disciplinary Procedure. However, an employee will not be disciplined or treated detrimentally solely because their complaint has not been upheld.

6.4.4 If an employee is not satisfied with the outcome of the investigation, they may appeal in line with the Company's Grievance Procedure. A link to the procedure can be found on Lighthouse. The appeal decision is final.

6.5 Record-keeping and Data Protection

6.5.1 Information about a complaint, including the outcome and relevant investigation records, may be kept on the personnel files of those involved. This information will be handled in line with the Company's Data Protection Policy and applicable data protection laws.

6.5.2 Information about a complaint and the people involved should only be shared where necessary or where there is a legal or regulatory requirement to do so. Employees are expected to respect the confidentiality of the process, and a failure to do so may result in disciplinary action.

## 7. THIRD PARTY HARASSMENT

7.1 The Company recognises that harassment can come from people outside the Company, including customers, clients, contractors, suppliers and members of the public. The Company expects all its employees to be treated with respect. Harassment by a third party will not be tolerated.

7.2 The Company will take all reasonable steps to protect employees from harassment, including sexual harassment, by third parties. Third-party harassment is not acceptable, regardless of the employee's role or the person responsible.

7.3 Employees who experience or witness harassment by a third party, including sexual harassment, are encouraged to report it promptly to their line manager or ERM/ERA. The Company will take reports seriously, look into what has happened and keep the employee informed where appropriate.

7.4 Employees will not be treated unfairly or disadvantaged for reporting third-party harassment, regardless of the identity of the third party or their commercial relationship with the Company.

7.5 Where third-party harassment is reported or identified, the Company will consider the appropriate action. Depending on the circumstances, this may include:

- raising the matter with the third party or their employer or organisation;
- restricting the third party's access to Company premises, services or employees;
- changing working arrangements or practices to reduce the risk of further incidents;
- reporting the matter to the police or other relevant authorities where appropriate; and/or
- reviewing existing measures to identify whether further steps are needed to prevent similar behaviour.

7.6 The Company also takes proactive steps to reduce the risk of third-party harassment. Depending on the circumstances, these may include risk assessments, appropriate communications or warnings to customers and members of the public, setting expectations for clients, contractors and suppliers about appropriate behaviour, and recorded messages at the start of customer telephone calls.

7.7 Customer facing employees are also encouraged to follow the Unacceptable Customer Conduct Guide. All employees have the right to use the 'Stop Card', in situations where they feel at risk.

7.8 Employees are encouraged to report unacceptable behaviour that they have experienced or witnessed against other employees by third parties, to their line manager or to use the Company's Whistleblowing line or to raise their concerns directly with the appropriate ERM/ERA.

## 8. EMPLOYEE SUPPORT

8.1 The Company recognises that experiencing and/or reporting unacceptable behaviour, or being the subject of a concern can be extremely difficult. Employees should speak to their Line Manager or ERM/ERA if they need support. The Company's independent Employee Assistance helpline is a confidential service available 24 hours a day, 7 days a week. They provide health and wellbeing support for employees during their employment. They can be contacted on freephone **01480 323323 (option 4)**. Details of the service can be found on Lighthouse.

8.2 For those employees who are trade union members, they may be able to obtain advice and support from their trade union. Trade unions often have useful information online that is available to the general public as well as members. Details of other sources of information and support are set out at **Appendix 2**.

## 9. PREVENTION

9.1 The Company has a positive, proactive and anticipatory duty to take all reasonable steps to prevent the sexual harassment of its employees and workers, whether by colleagues or third parties. In order to meet this duty, the Company has a comprehensive risk assessment in place that is reviewed on a regular basis and updated following incidents, changes to working practices or where new risks are identified.

9.2 The Company's risk assessment considers circumstances where there may be an increased risk of sexual harassment, including:

- customer-facing and public-facing roles;
- lone working;
- work-related social events, including those where alcohol is available;
- power imbalances within the workplace;
- digital communications and social media; and
- other working arrangements that may create an increased risk.

9.3 The Company regularly reviews the steps it takes to prevent sexual harassment and makes changes where needed. These measures include training, reporting channels, workplace initiatives and risk assessments.

9.4 The Company monitors complaints of harassment and victimisation and their outcomes to identify any recurring or wider issues and areas where further action or training may be needed. This includes monitoring whether concerns have been properly addressed and whether anyone who raises or supports a complaint has experienced victimisation.

9.5 Training is made available to all employees in relation to inclusion and dignity at work, via Workday, including how to recognise and respond to sexual harassment by colleagues and third parties. Managers receive additional training on their responsibilities when they witness or become aware of potential harassment.

9.6 Other Company policies provide guidance on unacceptable behaviour:

- Drugs & Alcohol Policy on behaviour in social settings;
- Acceptable Use of IT and OT Policy; and
- Social Media Policy.

## 10. FURTHER ASSISTANCE

Please contact your Employee Relations Manager/Employee Relations Advisor for further assistance. Details of the areas covered by each ERM/ERA can be accessed here.

**LAST REVIEWED** November 2026
**NEXT REVIEW** November 2029

## APPENDIX 1: DEFINITIONS

Discrimination, harassment, sexual harassment, bullying and victimisation are defined below.

The Company's policy specifically prohibits discrimination, harassment, bullying and victimisation in relation to caring responsibilities, ex-offender status, relationship status, family responsibilities or political opinion, as well as the relevant protected characteristics referred to below.

**Discrimination**
Discrimination is defined in law and relates to relevant protected characteristics, which are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Discrimination may include:

- Direct discrimination – less favourable treatment because of a protected characteristic – for example:
  - failing to recruit an individual into a role because of their race, gender reassignment or because they are pregnant; or
  - failing to offer training opportunities to an individual because of their age; or
  - selecting an individual for redundancy because of their disability.

- Indirect discrimination – applying a provision, criterion or practice which puts an individual at a particular disadvantage because of a protected characteristic compared with others who do not have that characteristic, in circumstances where it cannot be objectively justified for example:
  - applying an unjustified minimum height requirement for a role, which would put female job applicants at a disadvantage compared with male applicants because men tend to be taller; or
  - requiring applicants to hold a UK qualification, which would put applicants of a foreign nationality at a disadvantage as they would be less likely to hold a UK qualification; or
  - requiring applicants to hold a driving licence for 10 years, which would put younger applicants at a disadvantage to older applicants.

- Associative discrimination – discriminatory treatment due to the fact an individual associates with an individual who has a protected characteristic - for example:
  - refusing a request for flexible working from an individual looking to care for their child who has a disability, when flexible working requests from others have or would have been approved; or
  - refusing to invite a colleague to a social event because their partner is black, trans or holds a specific religious belief.

- Perceptive discrimination – discriminatory treatment based on an assumption that an individual has a protected characteristic – for example:
  - making offensive remarks about LGBT Pride events to someone based on a mistaken belief that the individual is gay; or
  - asking someone of Indian nationality, about their Islamic terrorist connections.

- Discrimination arising from disability – unfavourable treatment because of something arising in consequence of an individual's disability – for example:
  - setting a recruitment and selection test that puts individuals with dyslexia at an unfair disadvantage; or
  - refusing to work with a colleague because of their HIV status.

It is important to note that discrimination, harassment, sexual harassment, bullying and victimisation can take place between individuals or groups. It can be face to face, by telephone or in writing, for example email or text/instant messaging. It can be a one off incident or ongoing. It can occur even where there was no intention to cause offence.

**Harassment**

Harassment is defined in law as "unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else."

*Examples of harassment:*

Harassment can occur in many forms, and can take place either at work, outside work, in person, or online. While this is not an exhaustive list, examples include:

- "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 conversation or a social event or marginalising them from the group;
- derogatory comments about pregnancy, maternity leave or IVF treatment;
- mimicking or making fun of someone's disability;
- derogatory or offensive comments about religion;
- unwelcome comments about someone's appearance or the way they dress that is related to a protected characteristic;
- "outing" (ie revealing their sexual orientation against their wishes), or threatening to "out", someone;
- consistently using the wrong names and pronouns following the transition of a person's gender identity;
- displaying images that are racially offensive; and
- 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**

Sexual Harassment is defined in law 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;" and
- "less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to,sexual conduct".

*Examples of sexual harassment*

Sexual harassment can occur in many forms, and can take place either at work, outside work, in person, or online. 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.

**Bullying**
A commonly accepted definition of bullying is "Offensive, intimidating, malicious or insulting behaviour or an abuse or misuse of power through means that undermine, humiliate, denigrate (unfairly criticise) or injure 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.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment)

*Examples of bullying*
While this is not an exhaustive list, bullying may include:
- physical, verbal or psychological threats;
- excessive levels of supervision; and inappropriate and derogatory remarks about a person's performance;
- making threats about job security or blocking promotion, training or progression opportunities without good reason;
- setting someone up to fail or unreasonable workloads or expectations; and
- unjustified criticism.

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.

**Victimisation**
Victimisation is when someone is treated unfairly because they have raised or supported a concern about discrimination or harassment, taken part in an investigation or related proceedings, or are believed to have done or may do so.

*Examples of victimisation*
While this is not an exhaustive list, victimisation may include:
- denying someone an opportunity because it is suspected that they intend to make a complaint about harassment;
- excluding someone because they have raised a grievance about harassment;
- failing to promote someone because they accompanied another employee to a grievance meeting; and
- dismissing someone because they gave evidence on behalf of another employee at an employment tribunal hearing.

## APPENDIX 2: SOURCES OF INFORMATION AND SUPPORT

**Business Disability Forum -** Business Disability Forum

Is a not-for-profit member organisation that makes it easier and more rewarding to do business with and employ disabled people.

**ACAS – www.acas.org.uk**

ACAS is an organisation that provides information, advice, training, conciliation and other services for employers and employees to help prevent or resolve workplace problems.

ACAS provides a wealth of information online and also runs a free telephone helpline service.

**Citizens Advice Bureau – www.citizensadvice.org.uk**

The Citizens Advice Bureau provides advice and support for individuals on a wide range of issues, including work. General information is provided online. They run a telephone helpline and face-to-face appointments may be available at your local office.

**Bullying UK – www.bullying.co.uk**

Bullying UK is part of a charity called Family Lives. It provides advice and support on a wide range of issues relating to bullying including bullying at work. Information is available online and they run a telephone helpline.

**Equality and Human Rights Commission - www.equalityhumanrights.com**

The EHRC is Great Britain's national equality body. It provides guidance relating to equality issues across all areas of life including work to a wide range of individuals and organisations.

**Victim Support – www.victimsupport.org.uk**

Victim Support is a charity which provides free and confidential information and support relating to a wide range of crimes and antisocial behaviours, including sexual harassment. Individuals do not need to have reported a matter to the police in order to use their services.

It provides information online, has a telephone support line and local support teams who may be able to provide face-to-face advice and support.

**National Bullying Helpline – www.nationalbullyinghelpline.co.uk**

The National Bullying Helpline is a charity which provides advice and support relating to bullying including workplace bullying. It has advice online and provides a telephone helpline.

**Stonewall Information Services – www.stonewall.org.uk**

The Stonewall organisation aims to empower LGBT people to be their authentic selves, enabling them to realise and achieve their full potential. It provides information and advice online including local area contact details.