



— Somerset Wildlife Trust —

Bullying, Harassment and Sexual Harassment

Process for Volunteers and
Third Parties



Somerset
Wildlife Trust

NB: This document contains information and examples related to sexual harassment. Some readers may find this material upsetting. The content may also include sensitive or confidential details that must be handled with care. Please read and handle this material in line with our Data Protection Policy and our commitment to maintaining a safe and respectful environment for all.

For this document, the following meanings apply:

Volunteers: Individuals who are formally registered with the Trust to undertake volunteer activities on its behalf.

Third Parties: This includes contractors, consultants, suppliers, and partner organisations that have a formal relationship with the Trust, whether through a contract, memorandum of understanding (MOU), funding arrangement, or other formal agreement.

Third parties also include members of the public who run, support and/or attend Trust events or participate in the Trust's community engagement activities.

Definition

UK law takes a joined-up approach to preventing and addressing bullying and/or harassment and/or sexual harassment, as well as wider workplace misconduct. The Equality Act 2010 defines unacceptable behaviour, the Protection from Harassment Act 1997 addresses repeated harmful conduct, the Worker Protection Act 2023 requires employers to take reasonable steps to prevent harassment, and the Employment Rights Act 2025 provides a framework that protects individuals who raise complaints. While not all statutory protections apply equally to volunteers and third parties, relevant legal principles and duties of care still extend to them. Together, these laws promote prevention, accountability and the confidence to allow people to speak up.

Somerset Wildlife Trust understands that, as a volunteer-centred organisation, we have a duty to take reasonable steps to prevent bullying, harassment and sexual harassment. We are committed to taking reasonable steps to protect and prevent bullying, harassment and sexual harassment of all our staff, volunteers and third parties during the time they are volunteering, supporting or working with the Trust. The Trust will also take all reasonable steps to prevent such behaviour, and to protect any individual, including staff, volunteers and third parties, if we are aware that they are being subjected to bullying, harassment or sexual harassment.

Harassment, sexual harassment and victimisation in employment are protected under the work provisions in the Equality Act 2010. While these provisions legally apply to workers, the Trust extends the same standards of protection and expected behaviour to volunteers and third parties. This protection is based on the principle that individuals should not be harassed, discriminated against or victimised in the course of their working, supporting or volunteering activities.

Everyone has the right to be treated with dignity and respect whilst working, supporting or volunteering for the Trust. The Trust takes any form of incivility, bullying, harassment or sexual harassment seriously and has a zero-tolerance approach to this kind of behaviour. The Trust is committed to developing a positive and inclusive culture that does not tolerate any form of bullying or harassment and encourages everyone to maintain high standards of behaviour.

Whether an individual is the victim or a witness to this kind of behaviour, then this should be reported as soon as possible. This also applies to staff members who are bullied or harassment including sexual harassment by any volunteer or third party engaged with the Trust.

Identifying

Bullying, Harassment and/or Sexual Harassment is unwanted behaviour, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual, examples include:

- Unwanted physical contact and inappropriate physical conduct.
- Unwelcome remarks about personal matters including a person's age, dress, appearance, race or marital status, jokes at personal expense, offensive language, gossip, slander, sectarian songs and letters.
- Isolation or non-cooperation and exclusion from social activities.
- Coercion for sexual favours.

- Making derogatory jokes about a person's gender, or bullying behaviour towards an individual that is based on their sex.
- Unwanted conduct of a "sexual nature" which has this purpose or effect. For example, touching someone without their consent, or sending sexual jokes or pictures.
- Malicious or insulting behaviour, and abuse or misuse of power.
- Pressure to participate in political/religious groups.
- Personal intrusion from pestering, spying and stalking.
- Persistent unwarranted criticism.
- Personal insults.
- Invading someone's personal space and standing over them as they work.
- Cyberbullying including the use of internet, mobile technology, social media, messaging platforms, gaming platforms or mobile phones to harass, bully, or cause harm to another.

What to do

Always make sure that you keep your personal safety as your number one priority.

As a bystander, also think about the personal safety of the victim too.

Assess the situation. Are you with other people who will support you? Are you somewhere with other people in general? Is it an open space, or is it more closed in?

Thinking about the circumstance you are in can then help you recognise what action to take next.

How to raise a complaint

Volunteers/Third Parties should report allegations of any kind of bullying/harassment, including sexual harassment to the Trust's Volunteer representative working with them, your key staff contact or the Volunteer and Community Support Officer whether they have experienced it or witnessed it.

A meeting will be arranged with the Volunteer/Third Party as soon as possible to discuss the concern.

All concerns will be reported to the Designated Safeguarding Lead and, where appropriate, the HR Specialist. The Trust's safeguarding procedures will then be followed, and appropriate action will be taken.

The Trust's Public Event Code of Conduct states that everyone is expected to treat others with politeness, respect, and consideration. Any form of intimidation, discrimination, harassment, or abuse directed towards attendees, volunteers, staff, or organisers may result in the individual being asked to leave the event immediately.

Dealing with a complaint

If the Volunteer/Third Party raises a complaint, the Trust will investigate it carefully and thoroughly. All complaints will be dealt with promptly. The person to whom the Staff Member/Volunteer/Third Party complained will let them know within 2 working days the process that the Trust will follow.

An Investigating Officer who is independent of the complaint will be appointed. A meeting will be arranged with the Investigating Officer so that the Volunteer/Third Party can explain the nature of the concern in more detail and present any evidence they may have. They will be asked where and when they would like the meeting to be held. The Trust will then carry out an investigation and advise on timescales.

The Investigating Officer will discuss with the Volunteer/Third Party the various courses of actions available and what they would like to see. This might include but is not limited to interventions around behaviour and training, restrictions on the perpetrator, and/or dismissal of the perpetrator. The final decision sits with the Trust and, if required, after a thorough investigation.

The Trust has an obligation to be fair and transparent to the Volunteer/Third Party, but also to any others involved. If someone is potentially being accused of any kind of bullying or harassment including sexual harassment, this is viewed as serious misconduct, and the Trust is obligated to find out their side of the story as part of the

investigation. The Trust will respect any complaint the Volunteer/Third Party may have about their own safety or the impact on their involvement with the Trust.

Dependent upon the nature of the allegation, which may involve internal investigators and/or the police, it is not possible to lay down precise timescales for investigations. The Investigating Officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The Investigating Officer, should as soon as practically possible, send a written acknowledgement of the concern to the Volunteer/Third Party and report back to them, in writing, the outcome of the investigation and the action that is proposed. If the investigation is a prolonged one, the Investigating Officer will keep all parties informed, in writing, of the progress of the investigation and when it is likely to be concluded. In doing this, the Trust will respect the confidentiality of others and not compromise any potential future litigation or police involvement. All responses will be in writing and sent to their home address or personal email.

It is important that the Volunteer/Third Party does not discuss the issues with anyone else during the Trusts investigation. This is for two reasons: firstly, to make sure that the investigation is not compromised e.g. that any evidence that might indicate a criminal offence is not interfered with and secondly to protect the reputation of the individual(s) concerned in the event that the complaint is not upheld.

If the outcome of the investigation is that there is no case to answer, the Volunteer/Third Party will be informed of the reasons for this decision. Where it is considered that they had a genuine concern, the Trust will, acting in good faith, do everything the Trust reasonably can to ensure that they and any others involved are able to continue working together effectively and that the Volunteer/Third Party is not victimised as a result of making the allegation.

Confidentiality

Completely anonymous disclosures are difficult to investigate. If the Volunteer/Third Party wants to raise any concern confidentially, the Trust will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the concern.

If this is not possible as it would impede the investigation or due to legal or other reasons, the Trust will discuss this with them.

Protection and support for Volunteers/Third Party

The Trust aims to encourage openness and will support anyone who raises a genuine complaint under this policy.

Volunteers/Third Party must not suffer any victimisation through detrimental treatment as a result of raising a genuine concern. If they believe that they have suffered any such treatment, they should inform the Trust representative working with them or the Volunteer and Community Support Officer.

The Trust recognises that reporting a complaint of bullying/harassment/sexual harassment takes bravery and can be extremely stressful. The Trust will be as supportive as they can be and will ensure that there is signposting to additional support.

Monitoring and Risk Assessment

The Trust is committed to ensuring the safety of everyone who works with or for the Trust in all capacities. The Trust will conduct an annual sexual harassment risk assessment, monitoring the effectiveness of measures implemented to mitigate risks.

The Trust will ensure that a statement on bullying and harassment, including sexual harassment, is included on all activity risk assessments.

The Trust will review available training and assess the continued support and development needs of all its staff and volunteers.

Contacts

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Rights of Women	Call 020 7490 0152 https://www.rightsofwomen.org.uk/get-advice/call-our-advice-lines/
Equality and Human Rights Commission	Sexual harassment and harassment at work: technical guidance EHRC (equalityhumanrights.com)

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