CACI

Harassment and Bullying (Dignity at Work) Policy

Prepared for: CACI Employees

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Document Control

This section details document control in terms of its distribution, configuration management, amendment history and authorisation.

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1	Alison Johnson	February 2016	
2	Cristina La Torre	July 2018	General Review
3	Alison M Brooks	February 2020	General review and updates
4	Alison M Brooks	February 2021	General review
5	Alison M Brooks	July 2021	General review
6	Julie Jacob	January 2022	General review
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8	Alison M Brooks	December 2024	General review and updates
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Definitions / References

Terms	Definitions

This policy should be read alongside other polices in the RESPECT, SAFETY & CONDUCT Governance Framework:

- **Sexual Harassment Policy**
- **Equality Diversity and Inclusion Policy**
- **Disciplinary Policy**
- **Grievance Policy**

Introduction

The purpose of this policy is to ensure that all who works for, with, or on behalf of CACI, whether employees or third parties, are all treated with dignity, courtesy and respect and are able to work in an environment free from harassment, bullying, victimisation and unlawful discrimination.

The Company is committed to maintaining a safe, inclusive and respectful workplace and will not tolerate any form of harassment or bullying. Concerns raised under this policy will be taken seriously and addressed promptly and fairly.

Any breach of this policy may be dealt with under the Company's disciplinary procedure and, in serious cases, may constitute gross misconduct leading to summary dismissal.

Conduct of a sexual nature is addressed separately within the Company's **Sexual Harassment Policy**, which should be read alongside this policy.

Scope

This policy covers every individual working for or on behalf of, the Company, regardless of their role, seniority, status or length of service. the Company irrespective of their status, level or grade. It therefore this includes senior managers, officers, directors, employees, consultants, contractors, clients, trainees, apprentices, homeworkers, part-time or fixed-term employees, casual and agency staff and all other temporary workers.

All workers, including all third parties, are expected to comply with this policy and contribute to a working environment that is respectful, inclusive and free from harassment, bullying, victimisation and unlawful discrimination.

Legislative Framework

Under the **Health and Safety at Work Act 1974** the Company has a duty to provide its workers with a safe place and system of work. The Company is committed to taking all reasonable steps to prevent harassment, bullying, victimisation and unlawful discrimination and to fostering a workplace culture based on dignity, inclusion and respect. This includes a workplace free from harassment and bullying which may, in certain circumstances, also amount to unlawful discrimination.

The Company will not tolerate harassment, bullying, victimisation or discrimination related to a Protected Characteristic under the **Equality Act 2010** (see the Equality Diversity and Inclusion Policy), including conduct based on a perceived Protected Characteristic or association with someone who has a Protected Characteristic.

A person may be subjected to harassment even if they were not the intended target of the behaviour where the conduct creates an intimidating, hostile, degrading, humiliating or offensive environment. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for them.

The Company may, in certain circumstances, be legally responsible for the actions of its workers and for failing to take appropriate steps to prevent harassment by third parties encountered through work. In line with the strengthened requirements introduced by the **Employment Rights Act 2025**, the Company is

committed to taking all reasonable steps to prevent harassment and maintain a safe, respectful and inclusive working environment for all employees and third parties.

This policy confirms the Company's commitment to preventing, identifying and eliminating all forms of harassment, intimidation, bullying, victimisation and unlawful discrimination.

Responsibilities and accountabilities for this policy

The Company's board has overall responsibility for this policy and for promoting a workplace culture that is safe, inclusive and free from harassment, bullying, victimisation and discrimination.

Corporate HR is responsible for monitoring, reviewing and supporting the effective implementation of this policy and for recommending any necessary changes to ensure compliance with legal requirements and best practice.

Managers have a specific responsibility to lead by example, promote respectful behaviours, and ensure all workers understand the standards of behaviour expected of them. Managers are responsible for proactively identifying workplace risks that may increase the likelihood of harassment, bullying or victimisation and for escalating concerns to Corporate HR at the earliest opportunity. Managers must take prompt action where inappropriate behaviours are observed, reported or suspected, that fall below the standards set out in this policy. Managers should seek guidance or training from Corporate HR where required.

All workers are responsible for treating their colleagues with dignity and respect, complying with this policy, and considering whether their conduct could create an intimidating, hostile, degrading, humiliating or offensive environment. Harassment and bullying may occur regardless of intent and will not be tolerated.

Workers who experience, witness or become aware of behaviour that may breach this policy should report their concerns promptly to their manager or Corporate HR.

Questions regarding this policy should be directed to Corporate HR. The Company is committed to taking all reasonable steps to prevent harassment and bullying and maintaining a respectful, inclusive and safe working environment for all.

Prevention and Risk Assessment

The Company will undertake periodic workplace assessments to identify and mitigate risks that may contribute to harassment, bullying or victimisation. Consideration will be given to:

- client-facing environments;
- lone working;
- business travel;
- overnight stays;
- work-related social events;
- remote working and collaboration technology;
- power imbalances;
- third-party interactions.

Action plans arising from risk assessments will be monitored and reviewed by Corporate HR and business leaders.

Multiple Reporting Channels

The Company is committed to providing multiple, accessible channels for reporting concerns of harassment and bullying. Concerns may be raised with your manager, another manager, Corporate Human Resources, a senior leader, or through any designated reporting mechanism.

Reports may be made by individuals who have experienced, witnessed, or become aware of conduct that may breach this policy.

While the decision to raise a concern will generally rest with the individual, the Company reserves the right to investigate and take appropriate action where necessary to protect employees and maintain a safe, respectful working environment.

The Company will not tolerate victimisation, retaliation, or any detriment against anyone who raises a concern, makes a complaint, participates in an investigation, or supports another person in doing so.

Definitions of Harassment and Bullying

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of affecting a worker's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Physical conduct ranges from touching, pinching, pushing or brushing past someone to grabbing, shoving, punching and other forms of physical assault. In addition to the manner in which workers speak to and about one another, written material and pictures (including that disseminated by interactive and digital technologies) can be used to harass. This includes emails, text messages, film clips and photographs taken using cameras in mobile phones as well as content uploaded onto websites.

Harassment commonly, but not exclusively, targets the sex, sexual orientation, marital status, gender reassignment, race, religion, colour, nationality, ethnic or national origin, disability, HIV positive/AIDS status or age of the victim.

A single incident of unwanted or offensive behaviour to one individual can amount to harassment.

Non exhaustive examples of harassment include:

- unnecessary or unwanted physical contact, which the offender might perceive to be "horseplay", and which can include the invasion of personal space, touching or brushing against another worker's body as well as assault or coercing sexual relations;
- unwelcome sexual behaviour, which might be perceived by the offender to be harmless flirting, and which may involve suggestions, advances, propositions or pressure for sexual activity;
- suggestions that sexual favours may further an employee's career or that refusal of sexual favours may hinder it;
- continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome;
- inappropriate behaviour whether in the form of offensive or intimidating comments or gestures or insensitive jokes or pranks;
- the display or circulation of offensive pictures, objects or written materials which, for example, may be considered pornographic or offensive to particular ethnic or religious groups;

- unwanted conduct or conduct that has the purpose or effect of violating an individuals' dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment on the grounds of their sex, race, sexual orientation, disability, religion or age including abuse or insults about cultures, customs, appearance or dress;
- ignoring or shunning a worker, for example, by deliberately excluding them from a conversation or a workplace social activity.

Bullying is offensive, intimidating, malicious or insulting behaviour which, through the abuse or misuse of power, makes the recipient feel vulnerable, upset, humiliated and threatened. Power includes both personal strength and the power to coerce others through fear or intimidation. Bullying is often a form of harassment and can undermine an individual's self-confidence, competence and self-esteem. As with harassment, bullying can take the form of physical, verbal and non-verbal conduct. Physical conduct includes perceived horseplay, touching, pinching, pushing as well as grabbing, shoving, punching and other forms of physical assault. In addition to the manner in which workers speak to and about one another, written material and pictures (including that disseminated by interactive and digital technologies) can be used to bully. These include emails, text messages, film clips and photographs taken using cameras in mobile phones as well as content uploaded onto websites.

Bullying does not include legitimate and constructive criticism of a worker's performance or behaviour or reasonable requests made of workers.

Non exhaustive examples of bullying include:

- shouting at, being sarcastic towards, ridiculing or demeaning others;
- making physical or psychological threats;
- overbearing supervision and making inappropriate and/or derogatory remarks about a worker's performance;
- abuse of authority or power by those in positions of seniority;
- unjustifiably excluding colleagues from meetings/communications.

This policy covers harassment or bullying which occurs both in the workplace itself and in settings outside the workplace, such as business trips, events or social functions organised for or on behalf of the Company and on or off its premises.

Workers who believe they are being subjected to harassment or that they are being bullied should not hesitate to use the procedures set out below.

Harassment is unwanted conduct related to a Protected Characteristic, or conduct of a sexual nature, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment commonly, but not exclusively, targets Protected Characteristics.

Harassment can be physical, verbal, non-verbal or written and may occur in person or through digital communications. It can include comments, jokes, gestures, unwanted physical contact, offensive imagery, emails, text messages, social media activity, collaboration platforms and other online communications.

Harassment may relate to any Protected Characteristic under the Equality Act 2010, including age, disability, gender reassignment, race, religion or belief, sex and sexual orientation. It can also occur because of a perceived Protected Characteristic or an individual's association with someone who has a Protected Characteristic.

A single incident may be sufficient to constitute harassment.

Examples of harassment include (but are not limited to):

- unwanted physical contact or invasion of personal space;
- offensive, intimidating or degrading comments, jokes, banter or gestures;
- unwelcome sexual advances, propositions or requests;
- suggestions that accepting or rejecting sexual advances may affect employment opportunities;
- repeated and unwanted invitations or requests for social contact;
- displaying, sharing or circulating offensive, discriminatory or inappropriate material;
- abusive, insulting or offensive comments relating to a person's Protected Characteristic;
- deliberately excluding, isolating or ignoring an individual.

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that has the purpose or effect of undermining, humiliating, intimidating or injuring another person.

Bullying may be physical, verbal, non-verbal, written or digital and may occur as a one-off incident or a pattern of behaviour.

Examples of bullying include (but are not limited to):

- shouting at, ridiculing or demeaning others;
- making threats or intimidating remarks;
- abuse of authority or position;
- excessive, unfair or inappropriate criticism;
- deliberately excluding someone from meetings, communications or workplace activities;
- setting unreasonable objectives or workloads designed to undermine an individual.

Legitimate, reasonable and constructive management action, including performance management, supervision, conduct management, workplace instructions and reasonable business decisions, will not normally constitute bullying when carried out appropriately and respectfully.

This policy applies to conduct occurring in the workplace and in any work-related setting, including business travel, client sites, training events, conferences, work-related social events and communications conducted through work systems or personal devices where connected to work.

Any worker who experiences, witnesses or becomes aware of conduct that may breach this policy is encouraged to report their concerns promptly using the procedures set out below.

What to do if you have been/are being bullied or harassed: Informal Procedure

If you believe you are experiencing harassment or bullying and feel comfortable doing so, you are encouraged to raise the matter informally with the individual concerned at the earliest opportunity. In some cases, making it clear that their behaviour is unwelcome, offensive or causing discomfort may be enough to resolve the issue. If this is too difficult for you to do on your own, you should seek support from Corporate HR who will provide confidential advice and guidance and where appropriate assist in facilitating a resolution whether through informal or formal means.

If you are in any doubt as to whether an incident or series of incidents, may amount to harassment or bullying, you are encouraged to discuss the matter confidentially with Corporate HR in the first instance. Corporate HR will help you understand your options and determine the most appropriate way forward.

There is no requirement to attempt informal resolution before raising a formal complaint. If the matter is serious, if informal resolution is not appropriate or successful, or if the behaviour continues, you should follow the formal procedure set out below.

What to do if you have been/are being bullied or harassed: Formal Procedure

The informal procedure may not be appropriate due to the nature of the harassment or bullying or because you do not feel able to talk directly to the person creating the problem. In these cases or where the informal procedure has been unsuccessful, you should raise your complaint in writing with Corporate HR whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. See below for details of the information required to be included in your written complaint.

The informal procedure may not always be appropriate, particularly where the alleged bullying or harassment is serious in nature, where previous attempts to resolve the matter informally have been unsuccessful, or where you do not feel comfortable addressing the issue directly with the individual concerned. In these circumstances, you should raise your concerns formally by submitting a written complaint to Corporate HR

As a general principle, the decision to progress a complaint rests with you. However, the Company has a duty to protect all its workers and reserves the right to investigate and take appropriate action even where the individual raising the concern does not wish to pursue a formal complaint.

If you wish to make a formal complaint, you should write to Corporate HR setting out the details of your concerns. To enable a thorough assessment and investigation, your complaint should include, wherever possible:

- The name(s) of the individual(s) whose conduct is of concern
- Details of the behaviour or incidents complained of
- The date(s), time(s) and location(s) of the incident(s)
- The names of any witnesses or others who may have relevant information
- Copies of any relevant documents, messages, emails, screenshots or other evidence
- Details of any impact the conduct has had on you
- Any steps taken to address the issue or resolve it to date

Following receipt of your complaint, the Company will assess the matter and determine the most appropriate course of action, which may include an investigation under the relevant Company procedures.

Formal Procedure: Investigation

Complaints of bullying or harassment will be taken seriously and investigated in a timely and confidential manner to establish full facts. Your name and the name of the alleged harasser or bully will not be divulged other than on a "need to know" basis to those individuals involved in the investigation. The investigation will be thorough, impartial and objective, The Company is committed to ensuring that all concerns are

handled fairly, sensitively and confidentially, whilst respecting the rights and wellbeing of everyone involved.

An appropriately appointed Investigating Officer will conduct an independent investigation to establish the facts. Information will only be shared on a strictly need-to-know basis. Whilst absolute confidentiality cannot be guaranteed, all parties involved will be expected to maintain confidentiality throughout the process.

The Company will consider, on a case-by-case basis, whether any interim measures are necessary while the investigation is ongoing. This may include temporary changes to reporting lines, working arrangements, duties, work locations or, where appropriate, suspension on full pay. Such measures are precautionary only and do not imply that any conclusions have been reached.

At the outset of the investigation, the Investigating Officer will meet with you to obtain your account of the concerns raised. You may be accompanied by a work colleague or trade union representative of your choice. The Investigating Officer will also meet with the individual(s) against whom the complaint has been made, who will be afforded the same right of accompaniment. Witnesses or other individuals with relevant information may also be interviewed. All participants will be reminded of the importance of confidentiality and cooperation throughout the investigation.

Following completion of the investigation, the Investigating Officer will prepare a report setting out the evidence gathered and their findings. A senior manager, not previously involved in the matter where practicable, will consider the report and determine the appropriate next steps. The Company will seek to conclude the process and communicate the outcome as promptly as possible, although timescales may vary depending on the complexity of the matter. A copy of the Investigating Officer's report together with the senior manager's findings will be provided to you and to the alleged harasser.

Where the complaint is upheld, the Company will take appropriate action to stop the behaviour, prevent any recurrence and address the matter under the Company's disciplinary procedure where appropriate. Depending on the circumstances, disciplinary action may include a formal sanction up to and including dismissal.

Where a complaint is not upheld, this does not necessarily mean that the concerns were raised unreasonably or in bad faith. The Company will consider whether any additional support, mediation, training, changes to working arrangements or other interventions may be appropriate to support ongoing working relationships and maintain a respectful working environment.

Formal Procedure: Appeal

If you are dissatisfied with the outcome of your complaint, you may appeal the decision within 14 days of receiving the outcome. Your appeal should clearly set out the grounds upon which you are appealing.

The appeal will normally be heard by a manager who has not previously been involved in the matter and who, where practicable, is senior to the original decision-maker. You will be invited to an appeal meeting and may be accompanied by a work colleague or trade union representative.

The appeal manager will review the grounds of appeal, the investigation findings and any relevant evidence before reaching a decision. You will be informed of the appeal outcome in writing as soon as reasonably practicable. The appeal decision is final and marks the conclusion of the Company's internal procedure.

Protection for those making complaints or assisting with an investigation

The Company is committed to ensuring that no individual suffers any detriment, victimisation, retaliation or unfavourable treatment because they have raised a complaint, supported another individual, acted as a witness or otherwise participated in an investigation in good faith.

Any worker who believes they have been subjected to retaliation, intimidation or victimisation as a result of their involvement in a complaint or investigation should report the matter immediately to Corporate HR or raise the issue under the Company's grievance procedure.

Allegations that are made in good faith will not result in any adverse action, even where they are not ultimately upheld. However, where an investigation establishes that a complaint has been made maliciously, knowingly dishonestly, or in bad faith, such conduct may itself be treated as a disciplinary matter.

Harassment by Third Parties

The Company is committed to providing a working environment that is free from harassment, whether it originates from colleagues, contractors, suppliers, customers, clients, visitors or any other third party.

If you experience, witness or become aware of conduct by a third party that may constitute harassment, bullying or any other inappropriate behaviour, you should report it to your manager or Corporate HR as soon as possible. Early reporting enables the Company to assess the situation, provide appropriate support and take reasonable steps to prevent any recurrence.

Where concerns are raised, the Company will consider what action is appropriate in the circumstances. This may include raising the matter with the third party, reviewing working arrangements, restricting access to individuals, removing employees from situations where necessary, or taking any other reasonable steps to protect employees from further inappropriate conduct.

Confidentiality

Confidentiality is a fundamental part of the procedures under this policy. Every worker involved in *raising, handling, investigating or otherwise participating in a complaint are expected to maintain an appropriate level of confidentiality throughout the process.*

Information relating to complaints will only be shared on a need-to-know basis and only with those involved in managing, investigating or resolving the matter. Whilst the Company will make every effort to maintain confidentiality, complete confidentiality cannot always be guaranteed where a thorough investigation or legal obligations require information to be disclosed.

Any deliberate or inappropriate breach of confidentiality may give rise to disciplinary action under the Company's disciplinary procedure

Employee Assistance Programme

We would like to remind you that further support is available by contacting our Employee Assistance Programme (EAP) 0800 023 2296, this is a confidential 24-hour telephone counselling service, which can be accessed on HIVE.

Monitoring and Governance

The Company will monitor the effectiveness of this policy and review it regularly to ensure it remains compliant with legal requirements, reflects best practice and continues to support a respectful, inclusive and professional working environment.

The review and approval arrangements for this policy are set out in the document control section of this policy.

Review of Policy

This policy will be reviewed annually to ensure its effectiveness and compliance with current legislation and following any significant incidents.

The Company reserves the right to amend this policy at any time to reflect changes in employment legislation, regulatory requirements or business needs.

CACI