

ANTI-BULLYING AND HARASSMENT POLICY

POLICY — COMPANY FILE

Bullying, harassment and victimisation — with the sexual harassment risk assessment

KD-PQ-AH-011 Rev A0

Equality Act 2010 s.26. A person harasses another if they engage in unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating the other's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them (s.26(1)); if they engage in unwanted conduct of a sexual nature with that purpose or effect (s.26(2)); or if, because the other person rejected or submitted to unwanted conduct of a sexual nature, or related to gender reassignment or sex, by them or anyone else, they treat that person less favourably (s.26(3)). Whether conduct has that effect takes account of the person's perception, the other circumstances, and whether it is reasonable for the conduct to have that effect (s.26(4)). The relevant protected characteristics are age, disability, gender reassignment, race, religion or belief, sex and sexual orientation (s.26(5)) — marriage and civil partnership, and pregnancy and maternity, are not on that list; unfair treatment on those grounds is covered by KD-PQ-ED-003. Victimisation is s.27. An employer must not harass its employees or job applicants (s.40), and what an employee does in the course of employment is treated as done by the employer unless it shows it took all reasonable steps to prevent it (s.109). Section 40A, inserted by the Worker Protection (Amendment of Equality Act 2010) Act 2023 and in force since 26 October 2024, requires an employer to take reasonable steps to prevent sexual harassment of its employees in the course of their employment; it is enforced by the Equality and Human Rights Commission, and where a tribunal awards compensation for sexual harassment it must consider whether s.40A was breached and may increase the award by up to 25% (s.124A). Changes made by an Act passed in 2025 — making the duty one to take all reasonable steps; making an employer liable where it fails to take all reasonable steps to stop third parties such as clients, visitors and the public harassing its employees, which covers every kind of harassment in s.26, not only sexual harassment; and allowing regulations to say which steps count — were not in force on 13/09/2026. The government has said they take effect on 30 October 2026: check the commencement regulations. This policy is written to that standard now. Since 6 April 2026 a disclosure about sexual harassment can be a protected whistleblowing disclosure (KD-PQ-WB-009). Bullying is not defined in the Act. Written for England, Wales and Scotland; Northern Ireland has its own equality law.

CAS v5 Q68 — the anti-bullying and harassment policy (sections 2, 3, 5 and 6; a micro-business may use the statement in section 7). CAS v5 Q69 — what the business does to stop sexual harassment of its people by colleagues, clients and the public: the risk table in section 4 and how it is briefed (section 8).

The question numbers are Build UK's; the descriptions are ours. This document records what the business does; the assessment body decides what it accepts. Version 6 of the question set is due on 1 November 2026 and is not yet published — check the numbers against the version you are assessed on. The independence statement is in the footer of every page.

1 THE BUSINESS

COMPANY LOGO add it in your PDF editor, or print and paste it here	BUSINESS NAME	COMPANY NO.	PEOPLE EMPLOYED	VERSION	
	REGISTERED / TRADING ADDRESS	NAMED PERSON FOR CONCERNS			
	POLICY DATE	APPROVING DIRECTOR	POSITION	NEXT REVIEW DUE	

2 POLICY

Everyone who works for this business or on its sites is treated with dignity. Bullying, harassment — including sexual harassment — and victimisation are not tolerated from anyone: directors, managers, employees, agency and labour-only workers, subcontractors, clients, visitors or members of the public. The policy applies on site, in the office, in welfare cabins, vans and site accommodation, at work events, and online — group chats, social media, messages and calls. Managers who see it and do nothing are part of the problem. Anyone can raise a concern and it will be dealt with.

3 WHAT THE WORDS MEAN IN THIS POLICY — IN SUMMARY; THE ACT'S OWN WORDS GOVERN

- Harassment — the three kinds in s.26 set out above. On site that includes "banter" or nicknames aimed at someone's race, religion, sexuality, age or disability; mocking an accent; offensive images, jokes or graffiti in cabins and toilets.
- Sexual harassment — unwanted conduct of a sexual nature: comments about bodies or clothes, sexual jokes or images, whistling and remarks at the hoarding, unwanted touching or standing too close, repeated requests for a date, sexual messages or images in a group chat, and treating someone worse because they rejected or put up with it.
- Bullying — behaviour, once or repeated, that belittles, frightens, excludes or wears a person down, or uses power over their hours, pay or work unfairly: shouting and swearing at a person; public humiliation, "initiation" pranks on apprentices, threats about hours, pay or work, deliberately excluding someone, setting impossible tasks. It need not relate to a protected characteristic to breach this policy.
- Victimisation — treating someone worse because they complained, gave evidence or supported a complaint (s.27).
- Not bullying: a fair instruction, a reasonable deadline, or honest feedback on work, given respectfully.

4 SEXUAL HARASSMENT RISK ASSESSMENT — THE REASONABLE STEPS (S.40A), AND THIRD PARTIES

Assess where sexual harassment of your people is likely — from colleagues, supervisors, subcontractors, clients, visitors and the public — record the controls in place and the further steps. Ask the people most at risk what they see; consult the workforce (KD-HSA-CC-006). Strike out a row that does not apply to this business and say why in the last column. The third parties row covers harassment of any kind, which the 2025 changes bring into the duty.

SITUATION	WHO IS AT RISK — FROM WHOM	CONTROLS IN PLACE NOW	FURTHER STEPS — OWNER, DATE	RISK AFTER HMI
Site culture and welfare shared cabins, drying rooms, toilets and showers; images and graffiti; "banter"				
Lone and out-of-hours working security, night work, empty buildings, voids and plant rooms				
Occupied premises and homes residents, tenants, patients, staff of the client				
Clients, client representatives and visitors meetings, inspections; power over approvals and payment				

ANTI-BULLYING AND HARASSMENT POLICY

continued

POLICY — COMPANY FILE

KD-PQ-AH-011 Rev A0

SITUATION	WHO IS AT RISK — FROM WHOM	CONTROLS IN PLACE NOW	FURTHER STEPS — OWNER, DATE	RISK AFTER IMPLEMENTATION
Members of the public at the hoarding, traffic marshals, gate staff, deliveries				
Travel, site accommodation and work events shared vans, digs and hotels on away jobs, parties				
Group chats, social media and phones messages and images from colleagues or supervisors				
Power and dependency apprentices, young and agency workers wanting shifts; supervisors controlling hours				
Being one of few on site women, LGBT+ workers, young workers where they are a small minority				
Third parties — harassment of any kind abuse about race, religion, sexuality, age or disability from the public, a client or a visitor				

- Lockable or separate toilets and changing space on every site; no sexual images or graffiti anywhere — removed the day they are found
- The rule in site induction (KD-CDM-IN-009) and the site rules (KD-CDM-SR-010), for our people, subcontractors and visitors
- Clients and visitors told the standard expected (visitor briefing KD-SITE-VR-002); harassment of any kind by a client, visitor or member of the public acted on — raised with its employer, and the person barred if needed
- Lone working arranged so nobody is left exposed (KD-OH-LW-007); a way to call for help
- Supervisors and managers briefed on how to spot it, stop it and report it
- Rules for work group chats; a named person outside line management to report to

ASSESSMENT DATE	DONE BY — AND WHO WAS ASKED	REVISIT BY / TRIGGERS

5 RAISING A CONCERN

If it feels safe, tell the person their behaviour is unwanted. You do not have to. Tell your supervisor, or the named person below — who is outside the usual line of supervision. You can also use the whistleblowing routes in KD-PQ-WB-009, including anonymously. Every concern is recorded in the confidential file, acknowledged, and looked into promptly by someone not involved; the person raising it is supported, can be kept apart from the person complained about while it is looked into, and is told the outcome in writing. A person not satisfied can take it to a director. Harassment by a client, visitor or member of the public is reported the same way; the business deals with the third party.

NAMED PERSON — NAME AND ROLE	SECOND CONTACT	HOW TO REACH THEM

6 OUTCOMES

Bullying, harassment or victimisation found to have happened is dealt with under the disciplinary procedure and can be gross misconduct. A subcontractor's or labour supplier's operative is removed from site and the employer told in writing. A complaint made honestly that is not upheld is never held against the person who made it; a complaint known to be false and made to harm someone is misconduct.

7 MICRO-BUSINESSES — THE SHORT STATEMENT ROUTE

Where the question set allows a micro-business to give a written statement instead of a policy (CAS v5 Q68), this box and section 5 can stand for sections 2, 3 and 6 — check the size test your assessment body applies. The s.40A duty applies to every employer whatever its size, so keep section 4.

STATEMENT (MICRO-BUSINESS ONLY)

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continued

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KD-PQ-AH-011 Rev A0

8 RESPONSIBILITY, COMMUNICATION AND MONITORING

ROLE	NAME	WHAT THEY DO UNDER THIS POLICY

Evidence that the policy reached people: record each induction, briefing and issue on KD-CAS-PB-005 Policy Briefing and Acknowledgement Record — names, dates and signatures. Assessors ask for that record, dated within the last twelve months; only briefing people creates it.

HOW THE POLICY IS COMMUNICATED

HOW IT IS MONITORED, AND WHAT TRIGGERS AN EARLY REVISION

9 SIGNED FOR THE BUSINESS

I adopt this anti-bullying and harassment policy and the sexual harassment risk assessment for the business named in section 1, and I will make sure they are briefed, enforced and kept current.

SIGNED — PRINTED NAME	POSITION	SIGNATURE	DATE	NEXT REVIEW DUE

R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-13	first-issue	First issue.	— not yet approved —
A0	2026-09-13	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.