



Protection from Harsh or Inhumane Treatment

Definition

Reflex Group is committed to protecting and preventing harsh or inhumane treatment. Gender-based violence and harassment (GBVH) is considered unacceptable and will not be tolerated under any circumstance within this organisation. The organisation promotes the right for all employees to work in an environment which is free from violence and harassment through an approach which promotes protection, enforcement, remedies, guidance, training and awareness, highlighted in the ILO Violence and Harassment Convention, 2019. This prevention extends to third parties, whether that be the victim or perpetrator. With gender-based violence often formulating from a discriminatory perspective, the interlink of Human Resources and Health and Safety to prevent this treatment in the workplace is of utmost importance.

This policy applies to all workers regardless of their contractual status, including employees and agency workers.

This policy is applicable to the workplace, as well as in other work-related settings including work travel, training and social events, in employer-provided accommodation and in communication and interaction between workers, or between workers and clients or customers.

Legislation

The Equality Act 2010 protects individuals in the UK from experiencing discrimination, covering a wide range of protected characteristics, including age, disability, sex, sexual orientation, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, and religion or belief.

What is GBVH?

GBVH is an umbrella term that covers a range of behaviours, including sexual, physical, psychological and economic abuse, that is directed at people because of their sex or gender, or disproportionately affects people of a particular sex or gender. Women and girls are disproportionately affected by GBVH, but it can also be targeted at anyone.

Examples of GBVH include, but are not limited to, sexual harassment, domestic violence and psychological abuse. Sexual harassment is one of the most prevalent forms of GBVH in the working environment, consisting of any form of unwanted verbal, non-verbal or physical conduct of a sexual nature.

GBVH can be a one-off act or an ongoing pattern of behaviour. The following behaviours are non-exhaustive examples of GBVH:

- Sexual comments or jokes
- Sending explicit or sexually suggestive emails or text messages
- Psychological harassment, such as bullying
- Displaying sexually graphic pictures, posters or photos
- Unwelcome hugging or touching
- Propositions and sexual advances, including offering financial or employment benefits in return for sexual favours
- Physical abuse



- Banter within the workplace
- Domestic violence outside of work being brought into the workplace

What are the implications of GBVH?

Risks associated with GBVH can significantly impact onto the health and safety of employees whether this be through psychological or physical harm.

Any employee who is found to be acting in behaviour that breaches this policy, which further interlinks to the companies Equality, Inclusion and Diversity, and Bullying and Harassment policy, will be subject to disciplinary action up to and including summary dismissal.

What do I do if I am experiencing GBVH?

If you are a victim of GBVH, you should inform your manager in the first instance unless this is not reasonable and therefore you can raise this to HR. Your concerns will be taken seriously and investigated under the Grievance and Harassment policy.

If you wish to remain anonymous, you are entitled to raise concerns through the companies Whistleblowing policy where this will be investigated further.

What will the organisation do to prevent GBVH?

The company will undertake a risk assessment to assess the hazard that is presented within the workplace, alongside controls that are currently in place to prevent this and what further actions may need to be taken.

Training will be provided to all management roles on how to control the perceived risks, alongside being able to identify any concerns.

All workers should treat individuals with respect, abide by company policies and respect the confidentiality of GBVH survivors. Training will be provided by the company on GBVH prevention as part of induction processes, and workers will be trained on the policy. Enhanced training will be provided for management roles for prevention and response.

The organisation utilises an Employee Assistance Programme that can offer further external support for any individual who has experienced GBVH, alongside support services.

Record Keeping

The organisation will store all data and information, including grievance logs and monitoring records, securely and put in place measures to prevent any unauthorised access and protect confidentiality.



What is the hazard?	Who might be harmed and how?	What are you already doing to control the risks?	What further action do you need to take to control the risks?	Who needs to carry out the action?	When is the action needed by?	Done
Sexual comments or jokes	Employees, contractors and visitors may feel offended, intimidated or harassed	Training to employees and managers, policies issued, anonymous whistleblowing posters in place	Reinforce policy via regular communications and toolbox talks	HR, Management	Ongoing	
Sending explicit or sexually suggestive emails or text messages	Employees, contractors and visitors exposed to inappropriate content causing distress	Work conversations limited to approved communication channels	Monitor usage and provide refresher training on acceptable communication	HR, Management, IT	Ongoing	
Psychological harassment, such as bullying	Employees may suffer stress, anxiety, reduced wellbeing and performance	Dignity at Work policy, grievance procedure, manager training	Promote speak-up culture and conduct regular engagement surveys	HR, Management	Ongoing	
Displaying sexually graphic pictures, posters or photos	Employees, contractors and visitors exposed to offensive material	Posters approved and reviewed by management and HR	Carry out periodic audits of displays and remove any inappropriate materials immediately	Management	Quarterly	
Unwelcome hugging or touching	Employees may feel unsafe, uncomfortable or harassed	Code of conduct and harassment policy in place	Reinforce boundaries training and encourage reporting	HR, Management	Ongoing	
Propositions and sexual advances, including offering financial or employment benefits in return for sexual favours	Employees may experience coercion, distress or abuse of power	Anti-bribery and harassment policies	Provide targeted management training and clear reporting channels	HR, Senior Management	Ongoing	



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Physical abuse	Employees and others may suffer injury or harm	Incident reporting procedures, management intervention	Conflict management training and zero tolerance enforcement	HR, Management	Immediate/Ongoing	
Banter within the workplace	Employees may feel excluded or offended if banter crosses boundaries	Code of conduct and equality training	Reinforce expectations of respectful behaviour and intervene early	Management	Ongoing	
Domestic violence outside of work being brought into the workplace	The individual, colleagues and third parties at risk of harm	Welfare meetings, risk assessments, safety planning, flexible working options	Management training on handling situations and escalation procedures	HR, Management	Mid-summer	
Work-based violence (including aggression from colleagues, visitors or third parties)	Employees, contractors and visitors may be subject to verbal abuse, threats or physical harm	Zero tolerance policy, incident reporting process, management support	Introduce de-escalation training, review security measures (CCTV, access control), ensure lone working procedures are robust	HR, Management, Health & Safety	Ongoing	

Signed on behalf of the Reflex Group Ltd.



I. Kendall
Managing Director



T. Bexon
Head of HR & Payroll

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