



Anti-Harassment & Bullying Policy

LOKR Sports Ltd

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Document Control

Policy Owner: Operations Director\ **Approval Date:** 08/08/2024\ **Effective Date:** 08/08/2024\ **Review Date:** October 2026

Note: This policy must be reviewed annually or when significant changes occur to ensure continued relevance and effectiveness.

- **10/08/2024** (v1.0, Claire Robinson) Initial policy creation
- **10/08/2025** (v1.1, Claire Robinson) Annual review
- **08/10/2025** (v1.2, Claire Robinson) Updates for LOKR

1. Purpose

The purpose of this policy is to ensure that all employees of LOKR Sports Ltd ("LOKR") are treated, and treat others, with dignity and respect in a workplace free from harassment and bullying.

This policy applies to conduct occurring:

- In the workplace and during working hours.
- At off-site locations, business trips, events, or social functions

organised for or on behalf of LOKR; and

- In any communication or interaction related to LOKR's business,

including electronic communications and social media.

It covers harassment and bullying by employees and by third parties such as customers, suppliers, or visitors.

2. Scope

This policy applies to:

- All LOKR employees, contractors, agency staff, consultants, and

suppliers.

- All work-related interactions, whether on-site, remote, or at

third-party premises.

3. References

- **Equality Act 2010** -- Prohibits harassment related to protected

characteristics including age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation.

- **Protection from Harassment Act 1997** -- Makes it a criminal

offence to engage in a course of conduct amounting to harassment and provides victims with civil remedies.

- **Health and Safety at Work etc. Act 1974** -- Requires employers to

ensure employees' health, safety, and welfare, including mental wellbeing.

- **Data Protection Act 2018 (UK GDPR)** -- Requires that handling of

complaints and investigations complies with the principles of lawfulness, fairness, and confidentiality.

- **LOKR Disciplinary Policy and Procedure**
- **LOKR Equality, Diversity and Inclusion Policy**

4. General Principles

4.1 LOKR operates a zero-tolerance approach to harassment and bullying.\ 4.2 Such behaviour undermines employee wellbeing, damages organisational culture, and will not be tolerated.\ 4.3 All employees must treat others with dignity and respect and consider whether their words or actions could cause offence.\ 4.4 Unintentional harassment or bullying remains unacceptable.\ 4.5 All allegations will be treated seriously, confidentially, and investigated promptly. Serious cases may result in disciplinary action, up to and including summary dismissal.

5. Legal Framework

5.1 Under the **Equality Act 2010**, harassment related to any protected characteristic is unlawful.\ 5.2 The **Protection from Harassment Act 1997** makes it unlawful to engage in conduct causing alarm or distress.\ 5.3 Under the **Health and Safety at Work Act 1974**, LOKR has a duty to provide a safe working environment.\ 5.4 Individuals may also be held personally liable for harassment and subject to civil or criminal proceedings.

6. Policy Statement

6.1 Definition of Harassment

Harassment includes any unwanted physical, verbal, or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading,

humiliating, or offensive environment.\ Examples include but are not limited to:

- Unwanted physical contact (touching, pushing, invading personal space).
- Unwelcome sexual advances or suggestive remarks.
- Persistent suggestions of social contact despite refusal.
- Displaying or sharing offensive or pornographic material.
- Making offensive jokes or comments.
- Ridiculing disability or personal characteristics.
- Derogatory remarks about religion, ethnicity, or gender.
- Threats to reveal someone's sexual orientation or gender identity.
- Excluding or isolating colleagues.

A person can experience harassment even if they are not the intended recipient of the behaviour.

6.2 Definition of Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour intended to undermine, humiliate, or threaten another person.\

Examples include:

- Unjustified or excessive criticism.
- Spreading malicious rumours.
- Belittling someone in front of others.
- Unfairly assigning heavier workloads.
- Excluding individuals from social or work activities.
- Posting or sharing humiliating comments online.

Upward bullying occurs when staff behave in a disrespectful or undermining manner towards managers, such as:

- Repeatedly refusing reasonable instructions.
- Spreading rumours about supervisors.
- Publicly undermining authority.
- Persistent negative behaviour towards management.

7. Responsibilities

7.1 Executive Team

- Ensure a workplace culture free from harassment and bullying.
- Take proactive steps to prevent issues and model appropriate behaviour.
- Respond promptly to complaints and ensure fair resolution.
- Apply disciplinary action where necessary.

7.2 Managers and Supervisors

- Implement this policy and communicate it clearly to their teams.
- Support employees who raise concerns.
- Ensure no victimisation occurs after a complaint.
- Lead by example in professional conduct.

7.3 Employees

- Treat all colleagues with dignity and respect.
- Comply with this policy and the Code of Conduct.
- Report incidents promptly and confidentially.
- Support others who may be victims of harassment or bullying.

7.4 LOKR's Commitment

LOKR will:

- Provide induction and ongoing training on dignity at work.
- Offer support services such as the Employee Assistance Programme (EAP).
- Allocate resources to monitor and enforce this policy.
- Ensure complaints are investigated impartially and confidentially.

8. Procedures

8.1 Informal Procedure

1. Where possible, address the behaviour directly with the individual involved.
2. If this is not appropriate, speak with your line manager or HR for support.
3. Managers should aim to resolve issues informally and sensitively where appropriate.

8.2 Formal Procedure

1. Submit a written complaint to HR or a senior manager.
2. A formal investigation will be conducted promptly and confidentially.
3. The complainant may be accompanied at any interview or hearing.
4. Findings will be communicated in writing, and actions will be taken where appropriate.
5. Proven cases of harassment or bullying will result in disciplinary action.
6. False or malicious allegations made in bad faith may constitute misconduct.

9. Appeals Procedure

1. Appeals must be submitted in writing within **7 calendar days** of receiving the decision.
2. An impartial manager will review the case.
3. Employees disciplined under this policy may also appeal under the Disciplinary Procedure.

10. Third-Party Harassment

10.1 Employees harassed by customers, suppliers, or visitors should report the incident formally or informally. 10.2 LOKR will investigate and take proportionate action, which may include:

- Behavioural warnings or access restrictions.
- Termination of contracts with offending third parties.
- Reporting serious incidents to the police.

11. Timeframes and Record-Keeping

11.1 Complaints should normally be resolved within **30 days**; appeals within **15 days** where possible. 11.2 All records will be retained confidentially in line with the **Data Protection Act 2018** and LOKR's **Data Retention Policy**.

12. Enforcement:

All employees, contractors, and suppliers are expected to comply with this policy. Non-compliance may result in disciplinary action or termination of contracts, depending on the nature and severity of the breach. Persistent or deliberate breaches may be escalated to the Board for further action. LOKR reserves the right to audit compliance and require corrective measures where deficiencies are identified.

13. Monitoring and Review

12.1 This policy will be reviewed annually or earlier, if necessary, alongside the **Equality, Diversity and Inclusion Policy**. 12.2 HR will monitor complaint trends to identify and address systemic issues. 12.3 The Operations Director is accountable for ensuring implementation and ongoing compliance.