

Open Mike Productions Third-Party Harassment Policy

- 1) All members of staff are entitled to be treated with dignity and respect in their place of work. This means freedom from behaviour by third-parties such as customers/clients or suppliers that can be interpreted as bullying or harassment or that causes offense, and access to redress if such behaviour does arise.
- 2) This policy will be reviewed regularly to ensure it remains up to date and to monitor its effectiveness.

A) THIRD-PARTY HARASSMENT

Third-party harassment occurs when one of our workforce is subjected to harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our freelancers, suppliers and members of the public. Third-party harassment of our workforce will not be tolerated.

Conduct becomes harassment if it persists and it has been made clear that it is regarded as offensive by the recipient or a witness to the conduct, although a single offensive act can amount to harassment if it is sufficiently serious.

B) SCOPE

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all those who work for us. This includes employees, workers, agency workers, volunteers and contractors in all areas of our Company, including any overseas sites.

For more information on bullying and harassment that is not by a third party, please read our separate Bullying and Harassment Policy.

C) CIRCUMSTANCES WHICH ARE COVERED

- 1) This policy covers behaviour by third parties towards a member of our workforce which occurs in the following situations:
 - a) a work situation
 - b) a situation occurring outside of the normal workplace or normal working hours which is related to work, for example, a working lunch or social event with colleagues
 - c) outside of a work situation but against a colleague or other person connected to the Company, including on social media.

D) ACTION TO PREVENT THIRD-PARTY HARASSMENT

- 1) We take a zero-tolerance approach to third-party harassment of our workforce. Any complaints of third-party harassment will be taken seriously and thoroughly investigated.
- 2) In order to prevent third-party harassment from occurring and encourage staff to report any concerns, we will:
 - a) Allow for anonymous reporting of incidents of harassment.
 - b) Ensure that any issues with 3rd Parties are recorded.
 - c) Make sure no staff member works alone.
 - d) Make adjustments to the working environment (such as providing better lighting or adjusting working patterns).
 - e) Pay attention to more vulnerable staff like young workers or those who don't speak English as their first language, who might be less likely to report incidents of harassment.
 - f) Make sure staff have more than one trusted person they can speak to, other than their line manager, if they have an issue, and make sure that they know who they are.

Should a 3rd party harass a member of our workforce, they will be warned that continued provision of our service to them will cease if they are to act in a similar way again. Should their behaviour recur,

they will be informed that our contract with them will cease. Any criminal acts will be reported to the police, and we will share information relating to the incident with our other branches to ensure that we maintain a consistent approach to the cessation of our services.

E) WHAT TO DO IF YOU OR A COLLEAGUE IS SUBJECT TO THIRD-PARTY HARASSMENT

1) Informal complaint

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

If you are the victim of minor harassment, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

2) Formal complaint

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of Andrew Beint as a formal written complaint and again your confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- a) the name of the alleged harasser;
- b) the nature of the alleged harassment;
- c) the dates and times when the alleged harassment occurred;
- d) the names of any witnesses; and
- e) any action already taken by you to stop the alleged harassment.

On receipt of a formal complaint, where possible we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place, such as finding alternative work for you that does not involve contact with the alleged harasser where they are a customer, client or supplier, a temporary change of workplace or temporary period of homeworking.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation, which will normally be within ten working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the grievance procedure.

F) TRAINING

We provide training to all our staff on harassment and how they can report any incidents.

We ensure that all levels of management are trained on managing bullying and harassment in the workplace, including third-party harassment, and the procedure to follow if an allegation is reported.