TRUE

POLICY 20 · WORKER SAFETY POLICY

Anti-bullying and Harassment

TRUE's zero tolerance of bullying and harassment, including by store staff, clients and other workers, and the reasonable steps TRUE takes to prevent it.

True Intel Ltd, trading as TRUE · Company no. 17255261

Version 1.0 · Approved by Victoria Phillips, Director · 3 November 2026

Bullying and harassment are never acceptable in TRUE work, whoever it comes from: TRUE staff, clients, store staff, customers or other workers. TRUE takes all reasonable steps to prevent it, and acts quickly when it is reported.

1. Scope

1.1 This policy covers everyone involved in TRUE work: TRUE staff, workers, clients, store staff and customers. It applies in stores, at focus groups, while travelling for TRUE, and online, including in the app and in comments on published content.

2. The law

2.1 Harassment, including sexual harassment, is unlawful under the Equality Act 2010. Under the Worker Protection (Amendment of Equality Act 2010) Act 2023, employers must take reasonable steps to prevent sexual harassment of their workers.

2.2 From October 2026, under the Employment Rights Act 2025, that duty becomes a duty to take all reasonable steps, and it covers harassment by third parties such as clients, store staff and customers.

3. What it means

Term	What it means
Bullying	Behaviour that is offensive, intimidating, malicious or insulting, or that undermines or humiliates someone, often repeated.
Harassment	Unwanted behaviour linked to a protected characteristic, such as race, sex, disability or religion, that violates someone's dignity or creates a hostile or humiliating environment.
Sexual harassment	Unwanted behaviour of a sexual nature, such as comments about someone's body, sexual jokes, unwanted touching, or messages or images of a sexual nature.
Online harassment	Any of the above in messages, comments, posts or images.

4. The steps TRUE takes to prevent it

4.1 TRUE takes these steps to prevent bullying and harassment, and reviews them regularly:

Step	What TRUE does
Risk assessment	Harassment risks are assessed for every activity in the Young Worker Health and Safety Policy, and reviewed after every report.
Training	Every staff member is trained in this policy every year, as part of the Team Training Workflow. Every worker covers it in their induction.
Client rules	Clients agree to Part B of the Staff and Client Code of Conduct, including no direct contact with workers.
Safe settings	Two TRUE adults at every focus group, with ground rules agreed at the start. No contact outside the TRUE app.
Easy reporting	Several ways to report, including anonymously (section 7).
Quick action	Every report is acted on the same day it is received.
Monitoring	Victoria Phillips reviews every report and the steps in this table every 6 months.
Published content	Comments on any published content are moderated by TRUE or the client.

5. Harassment by store staff, clients or customers

5.1 The worker should leave straight away, under stop, leave, tell, and report it the same day. They are paid for the time worked.

5.2 TRUE contacts the client the same day and pauses work at that site. TRUE then looks into it with the client, who must take action. Serious or repeated harassment ends the contract. Anything criminal is reported to the police.

6. Harassment by other workers

6.1 Anyone who bullies or harasses another worker, at a focus group or online, is removed from the session. TRUE looks into it, and it may lead to the end of their Worker Agreement.

7. How to report it

7.1 Anyone can report bullying or harassment by:

- using "Raise a concern" in the TRUE app, which has an anonymous option;
- telling any TRUE staff member;
- telling the DSL, for anything involving a worker under 18; or
- emailing hello@true-agency.co.uk.

7.2 Parents and guardians can also report on behalf of a worker.

8. What happens next

8.1 TRUE acknowledges the report within 2 working days and offers support straight away. It investigates fairly, listening to everyone involved, and aims to finish within 10 working days. The person who reported it is told the outcome.

8.2 Any safeguarding concern goes to the DSL. Any allegation against an adult working with a worker under 18 is referred to the LADO.

9. No retaliation

9.1 No one is treated worse for reporting bullying or harassment, or for helping with an investigation. Victimisation is unlawful, and any staff member who does it faces disciplinary action.

9.2 Workers can also get free support from Childline if they are under 18, and free advice from Acas.

9.3 This policy is reviewed every year, after any serious report, and sooner if the law or TRUE's activities change.

Version	Approved by	Approved on	Next review
1.0	**Victoria Phillips, Director**	**3 November 2026**	**November 2027**