

STOWMARKET GOLF CENTRE LIMITED

ANTI-BULLYING, HARASSMENT & WHISTLEBLOWING POLICY

Document Date	June 2026
Review Date	June 2027
Responsible Person	Duncan Burl / Paula Burl (Directors)
Applies To	All staff, contractors, members, customers, and visitors

PART 1 — ANTI-BULLYING & HARASSMENT POLICY

1. Policy Statement

Stowmarket Golf Centre Limited is committed to providing a safe, respectful, and supportive environment for all staff, customers, members, and visitors. Bullying and harassment of any kind are unacceptable and will not be tolerated.

This policy applies to all staff regardless of their role, hours, or contract type. It also applies to the conduct of members and customers towards staff and other members or visitors on our premises.

2. What Is Bullying and Harassment?

Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates, denigrates, or injures the recipient. It can be:

- Physical — pushing, shoving, unwanted physical contact
- Verbal — shouting, name-calling, offensive jokes, persistent criticism
- Written or online — offensive emails, messages, or social media posts
- Psychological — excluding someone, spreading rumours, undermining confidence

Bullying does not have to be face-to-face. It can happen via text, email, social media, or any other form of communication.

Harassment

Harassment is unwanted conduct related to a protected characteristic (see the Equal Opportunities Policy) that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Examples include:

- Unwanted physical contact or advances

- Offensive comments, jokes, or banter related to someone's age, race, gender, disability, sexual orientation, religion, or other protected characteristic
- Displaying offensive material
- Repeatedly asking someone out after they have said no

Important

Intention is not a defence. Even if no offence was intended, conduct that has the effect of creating a hostile or humiliating environment is still harassment.

Banter that one person finds harmless may be experienced as bullying or harassment by another. Always consider the impact of your behaviour, not just your intent.

3. Examples of Unacceptable Behaviour

- Shouting at, swearing at, or verbally abusing a colleague, customer, or member of staff
- Making derogatory comments about someone's appearance, age, gender, race, sexuality, disability, or religion
- Spreading malicious rumours or gossip about a colleague
- Deliberately excluding someone from conversations, meetings, or activities
- Undermining someone's work or constantly criticising them unfairly
- Sending offensive or inappropriate messages, emails, or social media posts
- Making unwanted physical contact
- Threatening or intimidating behaviour
- Retaliating against someone who has made a complaint

4. Responsibilities

Management

- Set a clear example of respectful behaviour at all times
- Take all complaints seriously and act on them promptly
- Ensure all staff are aware of this policy
- Take appropriate disciplinary action where bullying or harassment is proven

All Staff

- Treat all colleagues, customers, members, and visitors with dignity and respect
- Challenge or report behaviour they witness that they believe constitutes bullying or harassment
- Co-operate with any investigation into a complaint
- Not victimise anyone who has made or supported a complaint

Members and Customers

- Treat all staff and fellow members or customers with respect

- Understand that abusive or harassing behaviour towards staff or other customers will result in removal from the premises and may result in membership being revoked

5. Making a Complaint

Anyone who believes they are being bullied or harassed — whether a member of staff, a customer, or a visitor — should report it as soon as possible.

Informal Resolution

In some cases, it may be possible to resolve the situation informally. If you feel comfortable doing so, you may choose to speak directly to the person concerned and explain that their behaviour is unwelcome and must stop. This is not always appropriate, and you should never feel pressured to do this.

Formal Complaint

If you wish to make a formal complaint:

- Speak to Duncan or Paula Burl, or put your complaint in writing
- Keep a record of incidents — dates, times, what was said or done, and any witnesses
- Your complaint will be taken seriously, investigated promptly, and treated in confidence
- You will not be penalised for raising a concern in good faith

What Happens Next

Your complaint will be acknowledged promptly.

An investigation will be carried out — this may include speaking to witnesses.

You will be kept informed of progress.

If the complaint is upheld, appropriate action will be taken — up to and including dismissal for staff, or membership revocation for members.

If you are not satisfied with the outcome, you may raise the matter with ACAS (0300 123 1100).

6. Confidentiality

All complaints will be handled with discretion. Information will only be shared with those who need to know in order to investigate and resolve the matter. However, complete confidentiality cannot always be guaranteed — particularly where the safety of an individual is at risk.

7. False Complaints

Making a deliberately false or malicious complaint is itself a serious matter and may result in disciplinary action. This policy is not intended to discourage genuine complaints — it exists to protect everyone.

PART 2 — WHISTLEBLOWING POLICY

8. What Is Whistleblowing?

Whistleblowing — or 'making a protected disclosure' — is when a worker reports a concern about wrongdoing, malpractice, or illegal activity that affects others. This is different from raising a personal grievance about your own treatment.

Examples of concerns that may be raised under this policy include:

- A criminal offence — including fraud, theft, or financial irregularities
- A health and safety risk to staff, customers, or the public
- Damage to the environment
- A breach of a legal obligation
- A miscarriage of justice
- The deliberate concealment of any of the above

You do not need to have proof before raising a concern. You only need to have a reasonable belief that the wrongdoing has occurred, is occurring, or is likely to occur.

9. Your Protection

Stowmarket Golf Centre Limited is committed to ensuring that anyone who raises a genuine concern under this policy is protected from retaliation, victimisation, or any other detriment as a result.

You Are Protected If:

- You make a disclosure in good faith
- You reasonably believe the information is true
- You are not acting for personal gain
- The disclosure relates to one of the categories listed in Section 8

If you suffer any detriment as a result of making a protected disclosure, you may have the right to make a claim to an Employment Tribunal under the Public Interest Disclosure Act 1998.

10. How to Raise a Concern

If you have a concern that you believe falls under this policy, you should raise it as soon as possible.

Internal — Speak to Management

In the first instance, raise your concern with Duncan or Paula Burl. You can do this verbally or in writing. Your concern will be:

- Acknowledged promptly

- Investigated as appropriate
- Treated with discretion and in confidence wherever possible
- Responded to — you will be told what action has been taken, or why action cannot be taken

If You Cannot Raise It Internally

If your concern relates to the conduct of Duncan or Paula Burl, or if you do not feel able to raise it internally, you may contact an external body:

Concern Type	Contact	Details
Health & Safety concerns	Health and Safety Executive (HSE)	hse.gov.uk / 0300 003 1647
Financial fraud or irregularities	HMRC	gov.uk/report-tax-fraud
General wrongdoing — confidential advice	Protect (formerly Public Concern at Work)	protect-advice.org.uk / 020 3117 2520
Employment rights	ACAS	acas.org.uk / 0300 123 1100

11. Confidentiality

Stowmarket Golf Centre will make every effort to keep the identity of anyone raising a concern confidential. However, there may be circumstances — particularly where legal proceedings are involved — where this is not possible. If this is the case, you will be told in advance.

Anonymous disclosures will be considered, but it should be noted that they are more difficult to investigate effectively.

12. False or Malicious Disclosures

This policy is designed to protect those who raise genuine concerns in good faith. Making a deliberately false or malicious disclosure is a serious matter and may result in disciplinary action.

13. Sign Off

This combined policy covers our commitments on anti-bullying, harassment, and whistleblowing. It should be read alongside the Equal Opportunities Policy, the Staff Welcome Pack, and the Disciplinary and Grievance Procedure.

Signed: Duncan Burl, Director / Paula Burl, Director

Date: June 2026

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