



Anti-Bullying, Harassment (including Sexual Harassment), Discrimination and Victimization Policy – Version for Volunteers

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Related policies/documents	Whistleblowing policy

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1. Introduction

The Worker Protection Act, effective from October 26, 2024, introduced a preventative duty for employers in regard to workplace sexual harassment. This act mandates employers to take proactive steps to mitigate risks, including those from third parties, and to implement reasonable measures to prevent harassment. The act aims to foster a safe and positive work environment and ensure employee well-being.



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At Lord's Taverners we have a zero-tolerance approach to any form of bullying, harassment (including sexual harassment), discrimination or victimisation.

Zero tolerance means that we:

- take all reported incidents seriously, and will investigate promptly, fairly and confidentially
- will support those raising incidents, in good faith
- take appropriate action that is proportionate to the circumstances of the case
- encourage everyone to stand up and support people who may be experiencing this behaviour (i.e. to be an active bystander)
- investigate fully any incidents received using our complaints process

We take this stance because we stand for doing what is right ahead of what is easy – we have a moral and ethical duty of care towards our people. Bullying, harassment, sexual harassment, discrimination and victimisation is wrong and clearly breaches to Lord's Taverners values and behaviours [Lord's Taverners - Our Values and Behaviours \(lordstaverners.org\)](https://lordstaverners.org)

We recognise that experiencing bullying, harassment, discrimination or victimisation can make volunteering intolerable and may have an emotional, physical and mental impact on those affected.

Where a volunteer is found to have engaged in inappropriate behaviour of this nature, the organisation will take appropriate action. The organisation reserves the right to determine the most appropriate response depending on the nature, severity and impact of the issue.

2. Scope

The purpose of this policy is to create a safe, respectful, and supportive environment for all. It outlines the responsibilities, procedures, and measures to prevent and address such incidents.

The UK's Worker Protection (Amendment of Equality Act 2010) Act 2023 (often referred to as the "Preventative Duty") came into effect on 26 October 2024. The legislation places a legal obligation on employers to take reasonable steps to proactively prevent sexual harassment of employees. This includes creating a harassment-free environment, anticipating potential risks and taking appropriate preventative action.

While this legal duty applies specifically to employees, Lord's Taverners recognises that volunteers have an equal right to a safe, respectful and inclusive environment. We are therefore committed to applying the same standards of protection to volunteers as we do to staff.

This means that when you volunteer with Lord's Taverners, you can expect to be treated with dignity and respect, and to be supported if you experience or witness bullying, harassment (including sexual harassment), discrimination or victimisation.

- Expectations of volunteers

In turn, we expect all volunteers to uphold these same standards. When acting on behalf of Lord's Taverners - whether at events, meetings, online, or in any other capacity - volunteers are expected to:

- Treat others with dignity and respect
- Contribute to a culture that is safe, inclusive and free from harassment



- Take reasonable steps to prevent inappropriate behaviour where it is within their influence to do so
- Raise concerns promptly if they experience or witness behaviour that falls below our standards

If concerns are raised about a volunteer's behaviour, these will be addressed fairly and proportionately using [the Complaints Process](#). In the first instance, this is likely to involve discussion and support to resolve concerns. However, where behaviour is serious or does not improve, the charity may need to review the individual's ongoing involvement as a volunteer. In some circumstances, this could result in the volunteer relationship coming to an end.

Our aim is always to resolve concerns constructively and to support volunteers to meet the standards expected. Any concerns will be managed in line with existing organisational procedures and principles of fairness and transparency.

3. What is bullying?

Bullying is defined by ACAS as the offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

Bullying can be isolated or repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online.

Bullying behaviour can include, but is not limited to:

- Physical – pushing, poking, kicking, hitting, biting, pinching etc.
- Verbal - name calling, sarcasm, spreading rumours, threats, teasing, belittling.
- Emotional – isolating others, tormenting, hiding items, threatening gestures, ridicule, humiliation, intimidating, excluding, manipulation and coercion.
- Sexual – unwanted physical contact, inappropriate touching, abusive comments, homophobic abuse, exposure to inappropriate films etc.
- Online/cyber – posting on social media, sharing photos, sending nasty text messages, social exclusion
- Indirect - Can include the exploitation of individuals.

For the purpose of this policy, bullying is not necessarily confined to being face to face and can include use of email, phone calls or messaging and social media, and WhatsApp groups.

4. What is harassment?

Harassment is defined as any unwelcome conduct based on race, colour, religion, sex, national origin, age, disability, or genetic information that creates a hostile, intimidating, or offensive work environment.

Harassment can include, but is not limited to:

- Inappropriate physical contact.
- Causing offence with lewd, racist or religious jokes, comments of a sexual nature or name calling (often misconstrued as “banter”).
- Displaying, circulating or discussing offensive materials in any form.
- Threatening or insulting behaviour or gestures.
- Persistent humiliation or demeaning of an individual.
- Behaviour which creates an intimidating, hostile, degrading, humiliating or offensive environment.



5. What is sexual harassment?

Sexual harassment is a form of harassment that includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a condition of a volunteer's participation.
- Submission to or rejection of such conduct by an individual is used as the basis for decisions affecting their involvement as a volunteer.
- Such conduct has the purpose or effect of unreasonably interfering with a volunteer's ability to take part in activities or creating an intimidating, hostile, or offensive environment; or
- Such conduct violates an individual's dignity.

Sexual harassment is genderless.

Examples of sexual harassment include, but are not limited to:

- Unwanted sexual advances or propositions.
- Offering benefits, privileges, or opportunities in exchange for sexual favours. Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct such as leering or looking someone up or down, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons, posters, upskirting or cyberflashing – flashing or exposure online.
- Verbal conduct such as making or using derogatory comments, asking about someone's sex life or preferences, epithets, slurs, or jokes as well as sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, clothing, appearance, sexually degrading words used to describe an individual, suggestive or obscene letters, notes, or invitations.
- Displaying, circulating or discussing offensive materials of a sexual nature in any form.
- Physical conduct against someone's will such as touching, hugging, sexual assault or rape, impeding, or blocking movements.
- Stalking.

- Less favourable treatment for rejecting or submitting to sexual harassment

This is any detrimental treatment of a person because they have rejected or submitted to sexual harassment.

It is also unlawful to treat someone less favourably because they have either complained about sexual harassment or rejected such behaviour.

Examples of less favourable treatment include:

- Denying someone a volunteering opportunity, responsibility, or access to training, events, or other benefits because they have refused or accepted sexual advances.
- Making derogatory comments or unwarranted criticisms because someone has refused to socialise or spend time with another volunteer or staff member who is a friend of the harasser.

6. Areas of consideration

It is important to remember that harassment is usually defined by the way it feels to the recipient (the **impact**), rather than the intent of the person causing the offence. It cannot



therefore be excused or justified by claiming that it was unintentional or humorous. It can be a one-off incident or an ongoing pattern of behaviour.

It also doesn't have to be the recipient that is offended by the nature of the comments or material. Sharing a "funny rude email" could cause offence to non-recipients which could lead to a complaint.

7. Criminality of harassment

Harassment can be considered a criminal offence, with possible police involvement, when a volunteer informs the organisation that they have been:

- physically attacked;
- sexually assaulted;
- threatened with violence;
- the recipient of repeated abusive or threatening messages, posts or texts either directly or via social media
- the victim of a hate crime, for example racist or homophobic abuse; or
- repeatedly stalked either in person or online.

A volunteer does not have to inform the police and in most cases, the organisation will respect this decision. However, the organisation may inform the police if they think there may be an ongoing risk to a volunteer's safety, the safety of others or an increased risk to their safety because the volunteer is a vulnerable person, for example they have a mental health condition.

8. What is a hate crime?

These are stated in law as acts of violence or hostility directed at people because of who they are. However, criminal law does not treat all protected characteristics equally. This means, for example, that someone who is assaulted based on disability is not afforded the same protection as someone who is assaulted because of their race.

Incidents of hate crime are a criminal offence and appropriate disciplinary action, including dismissal, may be taken.

9. What is discrimination?

By law, being discriminated against is when you are treated unfairly because of any of the following:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

These are known as '[protected characteristics](#)'. It's against the law for anyone to treat you less favourably because of them.

Examples of direct discrimination at work could be:

- Someone is not offered an opportunity to attend a prestigious event because



- they're a woman and the invite goes to a less suitable man
- A volunteer has surgery to change their sex. Some other volunteers find out about the surgery and stop inviting them to social events or excluding them from activities.
 - Someone decides not to put a volunteer on an invite list to an event where there will be large amounts of alcohol because they believe the colleague is Muslim because of their name and would therefore not want to work with alcohol.

10. What is victimisation?

The law says victimisation means 'suffering a detriment' because you've done or intend to do a 'protected act'.

A 'protected act' means acting in relation to discrimination law. This includes:

- making a complaint of discrimination or harassment
- supporting someone else's complaint
- gathering information that might lead to a complaint
- acting as an active bystander in a complaint
- saying something or giving evidence that does not support someone else's complaint
- The law also protects a person from victimisation when someone else thinks the person has done or intends to do any of the things above.

'Detriment' means someone experiences one or both of the following:

- being treated worse than before
- having their situation made worse

11. What is an active bystander?

An active bystander is an individual who witnesses potentially harmful or inappropriate behaviour and takes proactive action to intervene or challenge it. They don't just observe; they choose to say or do something to disrupt the situation and promote a safer, more inclusive environment.

Key aspects of an active bystander:

- Awareness: They recognise when behaviour is inappropriate or harmful.
- Decision-making: They choose to intervene rather than remain silent.
- Action: They take action to address the situation, which can include directly intervening, distracting the perpetrator, or seeking help from others.
- Skills: They have the skills to intervene safely and effectively, which can be learned through bystander training.
- Impact: Their actions can help prevent escalation, promote a positive culture, and encourage others to intervene.

Examples of active bystander interventions:

- Direct intervention: Speaking up to challenge a comment or action or directly addressing the perpetrator.
- Distraction: Drawing attention away from the situation to de-escalate it.
- Delegation: Seeking assistance from someone else who is better equipped to handle the situation, like an event lead.

Why active bystander intervention is important?

- It can prevent harmful behaviour from escalating.
- It creates a culture of respect and inclusion.



- It empowers individuals to take responsibility for creating a safe and positive environment.
- It encourages others to intervene and fosters a sense of collective responsibility.

12. Understanding the risks

Lord's Taverners is committed to taking reasonable steps to identify and reduce the risk of bullying, harassment and sexual harassment in volunteering activities. As a requirement of the Workers Protection Act, the organisation will carry out a risk assessment on a regular basis to identify any potential risks, working to mitigate these or significantly reduce the risks. These could include:

- Power imbalances - situations where some individuals hold greater influence or authority within a volunteer setting, for example experienced volunteers working with newer volunteers.
- Presence of alcohol - ensuring that risks when large amounts of alcohol are consumed at events are mitigated to protect workers and volunteers
- Lack of diversity - a lack of diversity in leadership or decision-making roles can contribute to power imbalances.
- Specific local or national events - events that raise tensions locally or nationally can create strong reactions, polarise opinions and create division.
- Cultural norms - environments where inappropriate attitudes, behaviours or stereotypes are tolerated and where individuals may not feel treated with dignity and respect.
- Barriers to reporting – situations where volunteers may feel unable to report bullying, harassment or sexual harassment, or feel discouraged from doing so.

-Volunteer-led events

Where volunteers organise events or activities on behalf of the organisation, the organising committee is responsible for ensuring that a **written risk assessment** is completed before the event takes place. This risk assessment must consider all relevant elements of the event, including the potential risk of bullying, harassment and sexual harassment, including how the presence of alcohol may contribute to this, and identify reasonable steps that can be taken to mitigate these risks.

While it may not always be possible to eliminate every risk entirely, organisers must demonstrate that they have considered the risks and taken appropriate steps to reduce them as far as reasonably practicable.

If a complaint is raised about conduct at an event and it is found that a full and appropriate risk assessment was not undertaken, the organising committee may be held accountable. The volunteer responsible for completing the risk assessment – or the Chair of the organising committee where no responsibility was clearly assigned – may be subject to a review of their suitability for the role.

13. Reporting procedure

Protecting our people is one of the most important responsibilities of the organisation. It is essential to ensure that the culture and environment support and enable everyone to stay safe, feel supported and thrive while volunteering.

Volunteers who believe they have been subjected to any form of bullying, harassment (including sexual harassment), discrimination or victimisation, or who have witnessed such conduct, if they feel confident and safe to do so, should;



Either

- **Ask the person to stop the behaviour and make it clear what aspect of their behaviour is unacceptable.**
- **Report this to a senior volunteer or a Lord's Taverners' staff member at the earliest opportunity.**

Or (if the volunteer is uncomfortable taking immediate responsive action)

- **Report it at the time to the most senior person present**
- **Document the incident and report it to a Lord's Taverners' staff member at the earliest opportunity.**

The appropriate person from the staff team will then investigate the incident thoroughly keeping the employee informed during every stage until the investigation is complete and decision on the outcome is confirmed.

-Finding a resolution

It may be that it can be resolved informally depending on the nature of the report. Your staff contact can support you with this, by listening to your concerns, either supporting you with how to resolve the matter informally yourself, they may talk to the person concerned directly (informally) on your behalf or they may help you seek resolution through mediation.

Mediation is completely voluntary and involves an independent, impartial person helping individuals or groups reach a solution that is acceptable to everyone. The mediator will talk to both sides separately and together.

If informal action does not resolve the behaviour, a volunteer can raise a formal concern.

Concerns should be reported through process found on the [values and behaviours](#) page. If appropriate, volunteers may also raise the matter with the member of staff they usually work with, or another appropriate contact within the organisation.

-Problem solving

Where possible, concerns should be provided in writing and include details of the behaviour, when it occurred, and any steps already taken to address the issue. However, the organisation recognises that in some circumstances a volunteer may not feel able to submit a written complaint. In these cases, the organisation may still take action where there is a duty of care to investigate or address the concern.

All concerns will be handled as promptly and confidentially as possible. The organisation will aim to ensure that all individuals involved are treated fairly and that any investigation is conducted impartially.

As part of an investigation, the organisation may:

- speak separately with the person raising the concern and the person the concern is about
- gather relevant information, which may include witness accounts or relevant documentation such as emails or messages
- review any other information relevant to the situation.

Following the investigation, the organisation will determine what action, if any, is appropriate. This may include steps to address behaviour, prevent a recurrence, or review a volunteer's suitability to continue in their role.

Where a concern relates to a member of staff, the matter may also be considered under the organisation's internal staff procedures.



If a volunteer raises a concern but does not wish it to be taken further, the organisation will normally respect this request. However, in some cases the organisation may still need to take action where there are safeguarding concerns or an ongoing risk to others. In these circumstances, the volunteer will be informed.

-Anonymity

Whilst volunteers may want to remain anonymous due to the nature and sensitivity of the allegations, the organisation has a duty of care to all its people to deal with any instances of bullying, harassment, sexual harassment, discrimination and victimisation in a timely and efficient manner. Should it lead to further action then the alleged bully will have access to all investigation notes and therefore it may not be possible for all persons to remain anonymous.

14. Third Party harassment

For complaints where harassment by a third party has occurred, the volunteer should inform us via the [Complaints process](#) as soon as possible after the event. The organisation will take all reasonably practicable steps to investigate the complaint and to prevent any further harassment.

Third party harassment occurs when one of our people is subjected to harassment by someone who is not part of our organisation, but who is encountered in connection with the work that we do. This includes our customers, suppliers, or the public. Third party harassment of our people will not be tolerated.

-Safeguarding

To prevent third party harassment from occurring, we have a *Designated Safeguarding Lead* team to support. Find out more about our Safeguarding procedures: [Lord's Taverners - Safeguarding](#)

Reporting a safeguarding concern:

- Concern is raised by a volunteer about an issue that isn't clearly safeguarding but could be a pattern of behaviour that should be noted.
- This concern may be raised to a staff member or directly with the DSL Team.
- The concern should be shared with the DSL team who will maintain a confidential and if requested anonymous record as means of an audit trail.
- Where the concern falls under the umbrella of safeguarding, the concern will be transferred to the DSL team to respond to in the usual way.

If you want to report a safeguarding incident or have a safeguarding-related concern, please contact safeguarding@lordstaverners.org

Should a client or customer harass a volunteer or staff member, 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 service to them will cease. Any criminal acts will be reported to the police.

15. Whistleblowing

The [Whistleblowing](#) policy is intended to address concerns relating to wrongdoing, risk or malpractice that impacts others. For a wrongdoing to be whistleblowing, the concern must impact others, not just yourself (i.e. it must be in the public interest).



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16. Police Involvement

In very exceptional cases, if the bullying or harassment is of such a serious nature that it presents a high immediate risk to your safety (or that of others), or where the incident is particularly serious (e.g. sexual assault, hate crime, etc.) the most appropriate action may be to report the matter to the police. Call 999 or report it via report-it.co.uk or police.uk.

17. Policy Review

This policy will be reviewed every two years (unless a change in law/legislation precedes this) by the Volunteer Manager and updated as necessary to ensure compliance with applicable laws and the ongoing commitment to a workplace free from bullying, harassment (including sexual harassment), discrimination and victimisation.

A partial or full review will also be triggered by any significant incident involving allegations of bullying, harassment or sexual harassment involving a volunteer. This is to ensure that guidance remains appropriate, effective, and practical to apply.

In addition, volunteers will have opportunities throughout the year to share feedback on their experience of working within the policy, which will help inform future updates and improvements.

Questions about this policy? Contact volunteering@lordstaverners.org

18. Training

Lord's Taverners will provide regular training to lead volunteers (e.g. committee chairs) regarding the prevention of workplace anti-bullying, anti-harassment, anti-sexual harassment, anti-discrimination and victimisation, including information on how to deal with it and how to report it. This will include updates in changes to the law, policies, practices and procedures.

Other volunteers, such as those who serve on committees in a non-chair role, are encouraged to attend this training, though at this time it is not mandatory for them to do so.