

Zero Abuse Policy

1. Scope and Purpose of this Policy

This Firm is committed to ensuring that all members of staff are treated with dignity and respect and treat others the same way. We believe that all individuals, regardless of their role or status, have the right to work in an environment which is free from any form of bullying or abuse (in those areas in which we have influence). Our policy is that the harassment, or bullying, or abuse of our staff is unacceptable behaviour. Any form of abusive, threatening, or violent behaviour (collectively referred to in this policy as “abuse”) toward staff will not be tolerated. This applies to the Firm’s professional dealings with: Partners, staff, clients and prospective clients, other professionals and third parties, including members of the public.

This policy covers any abuse that occurs in a workplace situation or during any situations related to work, such as: at a social event with colleagues, on a business trip, or at a client or other professional or third party event. The purpose of this policy is to ensure a safe and respectful environment for all staff, raise awareness of the impact of abuse in the workplace, and to encourage open conversations between line managers and staff. We are committed to supporting our staff who are affected by any form of abuse and to signpost relevant advice and assistance to anyone who needs it.

This policy applies to all Partners, staff and consultants, regardless of their length of service. The policy does not form part of any employee’s contract of employment. It may be amended at any time, and we may depart from it depending on the circumstances of any case.

We have carried out an assessment to assess the risk of different forms of harassment occurring in our workforce, including in different roles and departments, the steps we could take to reduce those risks and which of those possible steps are reasonable. This risk assessment will be reviewed annually in addition to when required.

2. What is abusive behaviour?

Abuse may take a number of forms (including bullying) and occur on a variety of grounds. It may also be directed at one person or a number of people. While not an exhaustive list, forms of abuse(whether it be verbal, physical, or psychological) include the following:

- Verbal insults, shouting, swearing, and name-calling.
- Intimidating, hostile, threatening gestures or risk of actual physical violence.
- Degrading, humiliating or discriminatory remarks.
- Bullying, harassment, or intimidation (in person, by phone, email or social media).

Abuse can occur whether or not it is intended to be offensive, as it is the effect on the victim which is important, not whether or not the perpetrator intended the effect. Abusive behaviour is unacceptable even if it is unintentional.

3. Consequences for the perpetrator

An allegation of abuse will result in an investigation and possible action in accordance with this policy. When deciding what action to take, we will take account of any aggravating factors, such as abuse of power over a junior member of staff. As well as giving rise to action, abuse is unlawful and individuals may be held personally liable for their actions. In some cases their behaviour may also amount to a criminal offence.

We will not tolerate sexual harassment of our staff by the Firm's clients, prospective clients, other professionals and others who work with us and third parties, including members of the public. As with any harassment or bullying, if you experience or witness any abuse, we would urge you to report it in accordance with this policy.

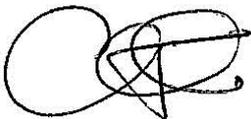
If an accident happens which you think may be abuse, you may prefer initially to attempt to resolve the problem on an individual basis, if you feel able to do so. In some cases it may be possible and sufficient for the affected person to explain clearly to the perpetrator that the behaviour in question offends them, is regarded abusive, and that they want the behaviour to immediately cease. This may be enough to make it stop. However, the affected person may not always feel able to take this step, and in more serious cases it will not be appropriate.

We will take the following steps to prevent abuse. All complaints will be dealt with promptly. We will make it clear that we have a zero tolerance policy in relation to abuse. If a complaint of abuse is received, we will seek to investigate the allegations and may warn the perpetrator about their behaviour, remove and/or take action to ban them from the Red House, refuse or withdraw legal services, terminate a client's retainer and/or report any acts to the Solicitors Regulation Authority, other businesses or authorities and/or the police.

4. Monitoring and Review

This policy will be monitored periodically by the Partners to judge its effectiveness. The Partners will review the policy in accordance with the results shown by the monitoring. If changes are required, the Firm will implement them. If requested and appropriate, the results can be supplied to staff, in a suitable format.

The COLP, Risk Partner/Staff Partner and Compliance Assistant will review this policy annually. Amendments may be made by the Partners from time to time and employees will be notified of any material changes as soon as possible.

A handwritten signature in black ink, appearing to read 'Chris Hugo', written over a circular stamp or mark.

Chris Hugo Staff Partner