The Global Biodiversity Standard

Anti-Harassment and Bullying Policy

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Policy owner	CEO, with Board oversight
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The Global Biodiversity Standard (TGBS Ltd)

Anti-Harassment and Bullying Policy

TGBS Ltd company policy

Everyone working with TGBS is entitled to an environment free from bullying, harassment, sexual harassment and victimisation, whether conduct occurs in person, online, during travel or through third parties.

1. Purpose

TGBS will prevent inappropriate conduct where reasonably possible, respond promptly and fairly, protect people from retaliation and take proportionate action when concerns are substantiated.

Conduct can breach this policy even if it was not intended to offend. The impact, context, seriousness, repetition and relative power of those involved will be considered. A single serious incident may be harassment.

2. Scope

This policy applies to TGBS Ltd directors, officers, employees, workers, consultants, contractors, volunteers and interns. It also applies, to the extent stated in contract or appointment terms, to TGBS hubs, certified assessors, technical reviewers, committee members, delivery partners and any other person acting for or representing TGBS.

The policy applies at work and to conduct connected with TGBS, including meetings, fieldwork, assessments, conferences, social events, travel, accommodation, messaging, email, social media and contact with clients, applicants, community members or other third parties.

- **Harassment:** unwanted conduct related to a protected characteristic that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Sexual harassment:** unwanted conduct of a sexual nature with that purpose or effect. Less favourable treatment because a person rejected or submitted to such conduct is also prohibited.
- **Bullying:** offensive, intimidating, malicious or insulting behaviour, or misuse of power, that undermines, humiliates, denigrates or injures another person. It may be a pattern or a serious single incident.
- **Victimisation:** subjecting someone to a detriment because they raised, supported or were believed likely to raise a concern, or participated in an investigation.
- **Reasonable management:** legitimate, respectful feedback, work allocation, performance management or disagreement is not bullying merely because it is unwelcome.

3. Policy principles

- Treat people with dignity; respect boundaries, names, pronouns and reasonable adjustments.
- Do not make degrading jokes, insults, threats, sexual comments, unwanted advances, intrusive questions, offensive images or repeated unwanted contact.
- Do not exclude, undermine, shout at, humiliate, sabotage or misuse authority over another person.

- Stop conduct when asked and never penalise a person for setting a boundary or raising a concern.
- Managers must act on behaviour they observe; waiting for a formal complaint may be inappropriate where risk is apparent.

TGBS will provide induction, periodic reminders and accessible reporting information. Contract and event terms should permit TGBS to act where harassment is committed by a client, supplier, hub, assessor, applicant or other third party.

4. Roles and responsibilities

- The Board approves the policy, oversees material risks and ensures that allegations involving senior leadership are handled independently.
- The CEO implements the policy, assigns proportionate controls and reports material matters to the Board. A responsibility may be delegated, but accountability remains with the role that delegated it.
- Directors and managers model the required conduct, act on concerns promptly, protect reporters from retaliation and identify conflicts before taking part in a decision.
- All covered persons must understand the policy, keep accurate records and raise concerns without delay.
- Each hub must nominate a responsible lead, cascade relevant requirements to assessors and subcontractors, maintain suitable local controls, comply with applicable local law, and report material concerns to TGBS. A hub remains responsible for its own legal duties and personnel.
- Assessors and reviewers must act impartially, declare conflicts, protect evidence and information, and never allow commercial or relationship pressures to affect their professional judgement.
- Managers, event leads and hub leads must assess foreseeable harassment risks, including third-party, travel, alcohol, isolated fieldwork and online risks, and take reasonable preventive steps.
- Anyone who witnesses inappropriate conduct is encouraged to intervene safely, record what they observed and report serious or repeated behaviour.

5. Policy requirements

5.1. Informal resolution

Where the person affected considers it safe and appropriate, they may tell the other person that the behaviour is unwelcome, ask a manager to communicate this, request mediation or seek another practical resolution. Informal action is voluntary and is not required before a formal complaint.

Mediation is unsuitable where there is alleged sexual misconduct, violence, serious abuse of power, safeguarding risk, retaliation or another reason why direct engagement may be unsafe or unfair.

6. Reporting and escalation

A person may raise a concern orally or in writing and may be accompanied or supported where appropriate. Anonymous reports will be considered as far as the available information allows. Reports should include the facts known, relevant dates, people involved and any evidence that can be preserved safely.

Situation	Route
Ordinary route	Report to the CEO and copy the Board Chair or another non-conflicted director.
Concern involves the CEO	Report to the Board Chair and at least one other non-conflicted director. The CEO must not receive, direct or decide the matter.
Concern involves the Board Chair	Report to the CEO and at least one other non-conflicted director. The Chair must not receive, direct or decide the matter.
Concern involves both the CEO and Chair, several directors, or internal independence is reasonably in doubt	Report to any non-conflicted director or to the Governance Contact, who must notify at least one other non-conflicted director and arrange an independent response. External professional advice or an external investigator must be used where necessary.
Immediate danger or suspected crime/regulatory breach	Contact emergency services, law enforcement or the relevant regulator where appropriate. Internal reporting is not a precondition.

The Board will maintain a current Policy Contact Register containing direct contact details for the CEO, Chair, Governance Contact and at least two other directors. The Governance Contact means the Company Secretary, if appointed, or a non-conflicted director designated by the Board.

No person may investigate, influence, decide or hear a review of a matter in which they are implicated or have an actual, potential or perceived conflict of interest. A report received by an implicated person must be forwarded immediately to a non-conflicted route without screening or alteration.

Retaliation, victimisation, obstruction, concealment, destruction of evidence and knowingly false or malicious allegations are prohibited. A report made honestly will not attract action merely because it is unsubstantiated.

A formal complaint should describe the behaviour, dates, context, witnesses, available records and the outcome sought. It should normally be acknowledged within five working days.

Where the alleged conduct is by a third party, TGBS may change personnel, restrict contact, remove a person from an activity, suspend work or require action by the relevant organisation while the matter is assessed.

7. Response and resolution

1. Triage the complaint for immediate safety, safeguarding, criminal, conflict-of-interest and evidence-preservation issues.
2. Appoint an impartial investigator and provide the subject with sufficient detail and a fair opportunity to respond.
3. Interview relevant people and review proportionate evidence. Avoid unnecessary repetition of distressing accounts.
4. Issue a reasoned outcome in writing, normally within 30 working days; explain delays and protective measures.

5. Allow either principal party to request an appeal within 10 working days on a material procedural error, new evidence, conflict or unreasonable outcome. The appeal must be decided by a person not previously involved and more senior or independently appointed.

The standard of proof for an internal finding is the balance of probabilities. An internal process does not determine criminal liability and may be paused or adapted after legal or police advice.

8. Confidentiality and records

Information will be shared only with those who need it to protect people, assess the matter, comply with law, obtain advice or take action. Absolute confidentiality cannot be promised where disclosure is necessary for a fair process or legal duty.

Records will be retained securely and only for as long as required by law, contract, the TGBS retention schedule or a legitimate operational need.

Personal data will be handled under the TGBS Data Protection Policy. Records must be factual, access-controlled and kept separately from general personnel or project files where sensitivity requires it.

9. Breaches and corrective action

Substantiated conduct may result in mandatory anti-harassment and bullying training, an apology, management action, restrictions, removal from an assignment or event, disciplinary action, termination of a contract or hub/assessor status, and referral under safeguarding or legal procedures. Action will be proportionate and consistent.

10. Monitoring and review

The CEO will review implementation and report material issues and trends to the Board. The policy will be reviewed on the date shown in the control table and sooner after a material incident, legal change or significant change to TGBS activities.

11. Related documents and legal framework

- TGBS Dignity at Work Policy; Code of Conduct; Equality, Diversity and Inclusion Policy; Safeguarding Policy; Whistleblowing Policy; Data Protection Policy.
- Equality Act 2010, including the employer duty to take reasonable steps to prevent sexual harassment; Protection from Harassment Act 1997; Employment Rights Act 1996; ACAS Code and guidance.