PHOENIX THEATRE & ARTS CENTRE

Bullying and Harassment Policy

Organisation: Phoenix Theatre & Arts Centre
Charity Registration Number: 1166858
Policy approved by: Board of Trustees
Date approved: 27 November2026
Review date: 27 november2028
Policy lead: Chief Executive Officer

1. Our commitment

The Phoenix Theatre & Arts Centre is committed to providing a welcoming, safe, inclusive and respectful environment in which everyone is treated with dignity.

As a charitable arts organisation, we recognise that our activities bring together people from different backgrounds, experiences and circumstances. We value creativity, diversity, collaboration and freedom of expression. We believe that everyone should be able to participate in, contribute to and enjoy our activities without experiencing bullying, harassment, discrimination, intimidation or abuse.

We have zero tolerance for bullying and harassment. Such behaviour will not be dismissed as part of the creative process, artistic temperament, workplace culture, a difference of opinion or the informal nature of a small organisation.

We are committed to:

- Treating everyone fairly, respectfully and with dignity.
- Preventing bullying, harassment, discrimination and sexual harassment.
- Taking concerns seriously and responding promptly and fairly.
- Providing clear and accessible ways to report concerns.
- Protecting anyone who raises a concern from victimisation or retaliation.
- Taking appropriate action where unacceptable behaviour is identified.
- Promoting a culture in which everyone feels safe to speak up.

This policy is supported by our commitment to equality, diversity and inclusion and our wider safeguarding responsibilities as a registered charity.

2. Who this policy applies to

This policy applies to everyone involved in or connected with the activities of The Phoenix Theatre & Arts Centre, including:

- Trustees and members of the Board.
- Employees, whether full-time, part-time, temporary or casual.
- Volunteers and work experience placements.
- Freelance workers, consultants and contractors.
- Artists, performers, musicians, tutors and workshop leaders.
- Members of community groups and participants in our activities.
- Individuals and organisations hiring or using our premises.
- Visitors, audience members, customers and members of the public.

The policy applies to behaviour:

- Within the arts centre and its grounds.
- During events, performances, exhibitions, workshops and other activities.
- At meetings, training sessions and work-related social events.
- During work-related travel or activities taking place away from the centre.
- Through emails, telephone calls, messaging services and social media.
- In online meetings, digital forums and other communications connected with the organisation.

Everyone covered by this policy is expected to behave respectfully and to help maintain an environment free from bullying and harassment.

3. What do we mean by bullying?

Bullying is behaviour that is offensive, intimidating, malicious, insulting, humiliating or undermining.

It may be a repeated pattern of behaviour or, in particularly serious circumstances, a single incident.

Examples include:

- Shouting at, threatening or intimidating another person.
- Publicly humiliating or belittling someone.
- Persistently criticising or undermining someone's work or abilities in an unreasonable way.
- Deliberately excluding someone from meetings, activities or communications.
- Spreading malicious rumours or making hurtful personal comments.
- Using a position of authority to intimidate, control or manipulate another person.

- Deliberately withholding information or support to make it difficult for someone to carry out their role.
- Making unreasonable demands or setting someone up to fail.
- Repeatedly undermining someone's confidence or professional reputation.
- Using aggressive, hostile or threatening language.

Bullying can take place between people at any level of the organisation, including between trustees, employees, volunteers, artists, participants and members of the public.

Bullying does not necessarily have to relate to a protected characteristic under the Equality Act 2010 to be unacceptable.

4. What do we mean by harassment?

Harassment is unwanted behaviour that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Under the Equality Act 2010, harassment related to certain protected characteristics is unlawful. These include:

- Age.
- Disability.
- Gender reassignment.
- Race, including colour, nationality and ethnic or national origins.
- Religion or belief.
- Sex.
- Sexual orientation.

The Equality Act also provides specific protection against sexual harassment.

Examples of harassment include:

- Offensive comments, jokes or remarks about someone's identity, background or personal circumstances.
- Racist, sexist, homophobic or transphobic language.
- Mocking someone's disability, appearance, accent or beliefs.
- Unwanted physical contact or invasion of personal space.
- Displaying offensive images, posters or material.
- Making derogatory comments or gestures.
- Deliberately misgendering or humiliating someone.
- Sending inappropriate messages, images or comments.
- Unwanted conduct of a sexual nature.

Harassment can occur even where the person responsible claims that they were joking or did not intend to cause offence. The impact and circumstances of the behaviour will be considered.

5. Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples include:

- Unwanted sexual advances or propositions.
- Sexual comments, jokes or innuendo.
- Unwanted touching, hugging or physical contact.
- Sharing or displaying sexually explicit images or material.
- Intrusive questions or comments about someone's body, relationships or sex life.
- Repeated requests for dates or sexual attention after someone has indicated they are not interested.
- Sending sexually suggestive messages or images.
- Suggesting that employment, opportunities, roles or benefits depend on providing sexual attention.

Sexual harassment is unacceptable regardless of whether it takes place between colleagues, between a person in authority and someone they supervise, or between individuals in other working or organisational relationships.

We recognise that the arts sector can involve close creative collaboration, rehearsals, performances, physical movement, costume, photography and artistic expression. These circumstances do not remove the requirement for appropriate professional boundaries, consent and respect.

From 30 October 2026, employers are required to take all reasonable steps to prevent sexual harassment of their employees. The organisation is committed to meeting this responsibility.

6. Behaviour that is not bullying or harassment

We recognise that working together creatively can involve disagreement, constructive criticism, artistic debate and differences of opinion.

The following will not normally constitute bullying or harassment when handled reasonably and respectfully:

- Giving constructive feedback about someone's work.
- Managing performance or addressing concerns about conduct.
- Making reasonable requests or setting appropriate expectations.
- Expressing a professional disagreement.
- Making decisions about programming, artistic direction or the allocation of resources.
- Taking appropriate action to manage health and safety or safeguarding concerns.

However, these activities must always be carried out respectfully, fairly and without intimidation, humiliation or discrimination.

The fact that behaviour is described as professional feedback, artistic direction or management action does not automatically make it acceptable.

7. Responsibilities

7.1 Board of Trustees

The Board of Trustees has overall responsibility for ensuring that the organisation promotes a safe and respectful culture.

Trustees will:

- Approve and periodically review this policy.
- Demonstrate appropriate standards of behaviour.
- Ensure that concerns are dealt with fairly and independently where necessary.
- Ensure that appropriate reporting arrangements are in place.
- Consider any wider organisational or safeguarding implications.
- Ensure that appropriate resources and training are available.
- Take appropriate action where allegations involve senior staff or trustees.

Trustees must not allow personal relationships, organisational pressures or concerns about reputation to prevent complaints being taken seriously.

7.2 Management and supervisors

The Chief Executive Officer and anyone responsible for supervising employees, volunteers, artists or activities must:

- Lead by example and promote respectful behaviour.

- Make people aware of this policy.
- Take concerns seriously and respond appropriately.
- Challenge unacceptable behaviour where it is safe to do so.
- Ensure that appropriate support is available.
- Report safeguarding concerns through the relevant safeguarding procedures.
- Take reasonable steps to prevent harassment, including harassment by visitors, customers, contractors and other third parties.

7.3 Employees, volunteers, artists and other users

Everyone involved with the organisation is expected to:

- Treat others with dignity and respect.
- Avoid behaviour that could reasonably be considered bullying or harassment.
- Respect personal boundaries and differences.
- Follow this policy and any relevant codes of conduct.
- Raise concerns when they experience or witness unacceptable behaviour.
- Cooperate honestly and appropriately with any investigation.

7.4 Trustees and people in positions of authority

People in positions of authority must recognise the additional responsibility that comes with their role.

They must not use their position, influence or access to opportunities to intimidate, exploit, threaten or disadvantage another person.

This includes the allocation of artistic opportunities, paid work, exhibition space, performance opportunities, commissions, funding, training and other organisational resources.

8. Third-party bullying and harassment

We recognise that employees, volunteers and other people involved with the arts centre may experience unacceptable behaviour from members of the public or individuals who do not work for the organisation.

This could include:

- Audience members or visitors.
- People attending workshops or events.
- Individuals hiring the premises.
- Contractors and suppliers.
- Artists or performers working with the centre.

- Members of community groups.

The organisation will take concerns about third-party behaviour seriously.

Where appropriate, we may:

- Speak to the individual responsible and explain our expectations.
- Issue a warning.
- Ask someone to leave the premises or an event.
- Restrict or withdraw access to the centre.
- Review a booking or hire arrangement.
- End a working relationship or contract.
- Contact the police where behaviour may constitute a criminal offence.

We will not expect employees or volunteers to tolerate abusive or harassing behaviour simply because it comes from a customer, visitor, hirer or member of the public.

We will take all reasonable steps to prevent harassment of employees by third parties in accordance with our legal responsibilities.

9. How to raise a concern

Anyone who experiences or witnesses bullying or harassment is encouraged to raise their concerns.

We understand that speaking up can be difficult, particularly in a small organisation where individuals may know each other well or work closely together.

Concerns can be raised with:

- The Centre Manager.
- The Chair of Trustees.
- Another designated trustee.
- [Insert name and contact details of an alternative independent contact, if available].

If the complaint concerns the Centre Manager, it should be raised with the Chair of Trustees.

If the complaint concerns the Chair of Trustees, it should be raised with another trustee who is not involved in the matter.

If a complaint involves several trustees or there is a conflict of interest, the organisation should arrange for an independent person to receive or oversee the complaint.

No one should be required to report a concern to the person whose behaviour they are complaining about.

Concerns can be raised verbally or in writing.

Where possible, it is helpful to provide:

- A description of what happened.
- When and where the incident took place.
- The name of the person or people involved.
- Whether anyone witnessed the incident.
- Any relevant emails, messages or other information.
- What outcome or support the person raising the concern would find helpful.

A person does not need to provide all of this information before raising a concern.

10. Informal resolution

Where appropriate, and if the person affected feels comfortable doing so, an informal approach may be considered.

This might involve:

- Speaking directly to the person responsible and explaining that their behaviour is unwelcome.
- Asking a manager or trustee to speak to the individual.
- Arranging a facilitated conversation or mediation.
- Clarifying expectations and agreeing appropriate boundaries.

Informal resolution will only be considered where it is appropriate and safe.

It will not be required where:

- The behaviour is serious.
- There are allegations of sexual harassment, assault, abuse or threats.
- There is a significant imbalance of power.
- There is a safeguarding concern.
- The person affected does not feel comfortable with informal resolution.
- Previous attempts to resolve the matter informally have been unsuccessful.

No one will be pressured to confront the person responsible or take part in mediation.

11. Formal complaints procedure

Anyone wishing to make a formal complaint should contact the Centre Manager or an appropriate trustee.

The organisation will aim to follow the procedure below.

Step 1: Acknowledgement

The complaint will be acknowledged as soon as reasonably practicable, normally within five working days.

The person raising the complaint will be informed of the next steps and the person responsible for handling it.

Step 2: Initial assessment

The organisation will consider:

- The nature and seriousness of the allegation.
- Whether immediate action is required to protect anyone involved.
- Whether the matter raises safeguarding or criminal concerns.
- Whether an informal or formal approach is appropriate.
- Whether an independent investigator is required.

Step 3: Investigation

Where a formal investigation is appropriate, an impartial person will be appointed to investigate.

This may be an appropriate manager, trustee or independent external investigator, depending on the nature of the complaint.

The investigation may include:

- Meeting with the person raising the complaint.
- Meeting with the person complained about.
- Speaking to witnesses.
- Reviewing relevant documents, correspondence or other evidence.
- Considering the circumstances and context of the alleged behaviour.

Everyone involved will have an opportunity to provide information and respond fairly.

Step 4: Decision

Following the investigation, the organisation will consider the findings and decide what action, if any, is appropriate.

Possible outcomes include:

- No further action.
- An agreed resolution or facilitated discussion.
- A formal warning.
- Additional training or supervision.
- Changes to working arrangements or responsibilities.
- Disciplinary action, in accordance with the organisation's disciplinary procedure.
- Ending a volunteer role, contract, booking or other organisational relationship.
- Referral to an appropriate safeguarding authority or the police.

Where the complaint concerns an employee, the organisation will follow its disciplinary and grievance procedures and applicable employment law.

Step 5: Communicating the outcome

The person raising the complaint and the person complained about will be informed that the investigation has concluded and advised of the outcome as appropriate.

The organisation will respect confidentiality and will not normally disclose personal or disciplinary details about another individual.

The organisation will aim to complete investigations promptly and normally within 30 working days where reasonably possible. If more time is needed, those involved will be kept informed.

12. Safeguarding concerns

Bullying and harassment may overlap with safeguarding concerns, particularly where children, young people or adults at risk are involved.

Any allegation or concern involving abuse, exploitation, inappropriate relationships, physical harm, sexual misconduct or a risk to a child or adult at risk must also be managed under the organisation's Safeguarding Policy.

Safeguarding concerns should be reported to the Designated Safeguarding Lead or the appropriate safeguarding contact.

The organisation will make referrals to external safeguarding agencies or the police where appropriate.

A safeguarding concern must not be delayed while an internal bullying or harassment investigation takes place.

Where there is an immediate risk of harm, emergency assistance should be sought by calling 999.

13. Confidentiality and record keeping

All complaints will be handled sensitively and, as far as reasonably possible, confidentially.

Information will only be shared with people who need it to investigate the complaint, provide support, manage risks or meet legal and safeguarding responsibilities.

The organisation will:

- Keep appropriate written records of complaints and actions taken.
- Store records securely.
- Limit access to relevant individuals.
- Retain records in accordance with its data protection and retention policies.
- Handle personal information in accordance with UK GDPR and the Data Protection Act 2018.

Absolute confidentiality cannot be guaranteed, particularly where there is a safeguarding risk or a legal obligation to disclose information.

14. Protection from victimisation

No one will be treated unfairly or disadvantaged because they:

- Have raised a bullying or harassment concern.
- Have supported someone making a complaint.
- Have acted as a witness.
- Have participated in an investigation.
- Have challenged unacceptable behaviour.
- Have raised a safeguarding concern in good faith.

Victimisation or retaliation will itself be treated as a serious breach of this policy.

This protection applies whether or not a complaint is ultimately upheld, provided it has been raised honestly and in good faith.

Knowingly making a malicious or deliberately false allegation may itself result in appropriate action. However, a complaint that is not upheld does not mean that it was made maliciously or dishonestly.

15. Support for those involved

The organisation recognises that bullying and harassment can have a significant impact on someone's wellbeing, confidence and ability to participate in activities.

We will seek to provide appropriate support to anyone affected.

This may include:

- Regular check-ins with an appropriate manager or trustee.
- Temporary changes to working arrangements or activity participation.
- Adjustments to schedules or responsibilities.
- Signposting to external support services.
- Appropriate measures to reduce contact between individuals while a complaint is being considered.

We will also seek to ensure that the person complained about is treated fairly and is given an opportunity to respond.

Any temporary arrangements will not be treated as a finding of wrongdoing.

16. Prevention, training and awareness

The organisation recognises that preventing bullying and harassment is as important as responding to complaints.

We will take reasonable and proportionate steps to create a positive culture, including:

- Making this policy available to employees, trustees, volunteers, artists and other relevant individuals.
- Including expectations of behaviour in volunteer agreements, contracts, artist agreements and venue hire terms where appropriate.
- Ensuring that people in supervisory and leadership positions understand their responsibilities.
- Providing appropriate information or training on equality, diversity, bullying, harassment and safeguarding.

- Encouraging people to raise concerns at an early stage.
- Reviewing potential risks associated with events, workshops, performances and other activities.
- Making it clear that abusive or discriminatory behaviour from visitors and members of the public will not be tolerated.
- Reviewing complaints and incidents to identify patterns or areas where improvements are needed.

The organisation will pay particular attention to situations involving unequal power relationships, including relationships between artistic directors, tutors, workshop leaders, trustees, employees, volunteers and participants.

17. Breaches of this policy

Any breach of this policy will be taken seriously.

Depending on the circumstances and the individual's relationship with the organisation, appropriate action may include:

- Informal advice or a formal warning.
- Disciplinary action.
- Removal from a volunteer position.
- Termination of a freelance or contractual arrangement.
- Withdrawal of permission to use the premises.
- Restriction or withdrawal of access to events and activities.
- Referral to external authorities where appropriate.

Any action involving employees will be managed in accordance with the organisation's employment procedures and applicable legislation.

18. Monitoring and review

The Board of Trustees will review this policy at least annually and following any serious incident or significant change in relevant legislation or guidance.

The review will consider:

- Whether the policy remains appropriate for the organisation.
- Whether reporting arrangements are accessible and effective.
- Whether complaints have been handled appropriately.
- Whether additional training or preventative measures are needed.
- Whether there are recurring patterns or organisational risks.

The organisation will aim to learn from concerns and incidents and use this learning to improve its culture and working practices.

19. Related policies

This policy should be read alongside the organisation's:

- Equality, Diversity and Inclusion Policy.
- Safeguarding Children and Adults at Risk Policy.
- Disciplinary Procedure.
- Grievance Procedure.
- Whistleblowing Policy.
- Volunteer Policy.
- Code of Conduct.
- Data Protection and Privacy Policy.
- Health and Safety Policy.

20. Approval

This policy was approved by the Board of Trustees of The Phoenix Theatre & Arts Centre on:

Date: 27 November 2026

Signed on behalf of the Board: Eric Clifford

Name: Eric Clifford

Position: Chair of Trustees

Next review date: 27 November 2028