



Anti-Bullying Policy

**Clear governance.
Strong practice.
Safe services.**



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1. Purpose

Bullying undermines safety, destabilises shared accommodation, damages workplace culture and increases safeguarding risk. In D2's operating model, where properties are shared, residents may be vulnerable, and staff work in high pressure environments, bullying is a significant and foreseeable risk that must be managed consistently and proportionately.

Bullying can cause emotional harm, distress, intimidation and fear. It can escalate quickly in shared houses, HMOs and young people's placements, particularly where trauma, exploitation, power imbalance or digital communication are involved. In workplace settings, bullying affects morale, performance, boundaries and professional conduct, and can compromise the reputation, quality and safety of services.

This Policy sets out D2's approach to preventing, identifying and responding to bullying across all D2 settings, including accommodation, offices, operational workspaces and digital communication channels. It establishes clear expectations for residents, staff, contractors and visitors, and ensures that concerns are managed in a fair, trauma informed and proportionate way.

2. Scope

Bullying can occur in any environment where people live or work together. D2's responsibilities differ depending on whether the behaviour involves residents, young people/UASC, staff, contractors or visitors.

This Policy applies to:

- Residents (adults, young people aged 16–17, and UASC)
- D2 employees
- Contractors, subcontractors and professionals working on behalf of D2
- Visitors attending D2 properties

It covers behaviour occurring:

- In accommodation settings (shared houses, HMOs, self contained homes)
- In offices and operational workspaces
- During digital communication (WhatsApp, messaging apps, social media and emails)
- Off site where behaviour impacts safety, wellbeing or professional conduct



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3. Definitions

Clear definitions ensure bullying is recognised early and not dismissed as conflict, “banter” or personality clashes.

Bullying

Bullying is behaviour that causes emotional or physical harm, distress, humiliation or intimidation. It may be one off or repeated, subtle or overt, and can occur between:

- residents
- staff
- contractors
- staff and residents
- groups (“mobbing”)

Bullying may involve:

- threats, intimidation or coercion
- exclusion or isolating someone
- persistent criticism, belittling or humiliation
- spreading rumours or false information
- mocking, name calling or degrading comments
- hostile or abusive digital messages
- misuse of power or influence

Digital Bullying

Bullying through WhatsApp, messaging apps, social media, group chats or any other electronic means. This includes:

- abusive messages
- group exclusion
- sharing harmful content
- coordinated harassment
- misuse of house WhatsApp groups

Harassment

Unwanted conduct that violates dignity or creates a hostile, degrading or offensive environment. May relate to protected characteristics (Equality Act 2010).

Victimisation

Treating someone unfairly because they have made, or intend to make, a complaint.



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4. Policy Principles

D2's approach is grounded in safety, trauma informed practice and proportionality. Bullying is treated as a foreseeable risk that can escalate into safeguarding concerns, placement breakdown or workplace misconduct.

Core principles:

- Safety first – bullying is a safeguarding concern where harm, vulnerability or exploitation is present
- Zero tolerance of bullying, harassment or victimisation
- Early intervention to prevent escalation
- Fair, transparent and proportionate responses
- Psychological safety for residents and staff
- Support for all parties involved
- Clear reporting routes and non retaliation
- Multi agency working where risk or safeguarding thresholds are met

5. Legislation & Regulatory Framework

Bullying creates foreseeable risks that intersect with safeguarding, equality, housing law and workplace conduct. D2 operates across England and Wales, and must ensure its responses are legally defensible, proportionate and aligned to statutory duties.

Understanding the legislative framework ensures that bullying is treated not simply as interpersonal conflict, but as behaviour that may trigger safeguarding thresholds, discrimination protections, or health and safety obligations. This section sets out the legal context that underpins D2's operational approach.

Relevant legislation includes:

- Equality Act 2010
- Protection from Harassment Act 1997
- Health & Safety at Work etc. Act 1974
- Human Rights Act 1998
- Data Protection Act 2018 / UK GDPR



**Our Purpose is Shelter.
Our Values are Strength.
Our Promise is Dignity.**

Safeguarding legislation:

England:

- Care Act 2014;
- Working Together to Safeguard Children (2018)

Wales:

- Social Services and Well being (Wales) Act 2014;
- Wales Safeguarding Procedures (2019)

Bullying involving young people/UASC, exploitation, coercion or intimidation may trigger statutory safeguarding pathways.

6. Responsibilities

Clear responsibilities are essential for maintaining safe accommodation and professional workplaces. Bullying can escalate rapidly in shared housing, young people's placements and high pressure operational environments, and everyone connected to D2 has a role in preventing harm, reporting concerns and modelling respectful behaviour.

This section defines the expectations placed on managers, staff, contractors, residents and visitors, ensuring accountability and consistent practice across all settings.

6.1 D2 Management

Managers must:

- model respectful, professional behaviour
- enforce this Policy consistently
- ensure staff understand reporting routes
- respond promptly to concerns
- conduct fair, proportionate investigations
- escalate safeguarding concerns
- ensure contractors understand expectations



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6.2 Employees and Subcontractors

Staff and contractors must:

- treat colleagues and residents with dignity and respect
- report bullying concerns immediately
- follow safeguarding and incident reporting procedures
- maintain professional boundaries
- cooperate with investigations

6.3 Residents (Adults, Young People, UASC)

Residents must:

- treat others respectfully
- avoid behaviour that intimidates, harms or excludes others
- report bullying affecting themselves or others
- ensure visitors behave safely
- engage with support where appropriate

6.4 Visitors

Visitors must:

- behave safely and respectfully
- not engage in bullying or harassment
- leave the premises if behaviour is unsafe or disruptive

7. Prevention and Awareness

Preventing bullying begins long before incidents occur. In D2's operating model, where residents may have experienced trauma, exploitation or instability, and staff work in dynamic environments, early awareness, clear expectations and proactive communication are critical. Prevention reduces escalation, supports psychological safety and strengthens community stability. This section outlines how D2 promotes awareness and reduces the likelihood of bullying emerging in accommodation or workplace settings. D2 will:

- provide awareness level training to staff
- ensure residents understand expectations through induction and house rules
- promote psychological safety in shared accommodation
- monitor digital communication where appropriate (e.g., house WhatsApp groups)
- work with partner agencies where bullying affects safety or housing sustainment



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8. Reporting Bullying

Reporting bullying can feel difficult, especially in shared accommodation, young people's placements or workplace environments where relationships are close and power dynamics may be complex. D2 provides safe, accessible and confidential routes for raising concerns, ensuring that all reports are taken seriously and handled without fear of retaliation.

This section explains how bullying can be reported and how D2 ensures concerns are recorded, escalated and managed appropriately.

D2 provides multiple reporting routes:

- line manager or senior staff
- House Manager
- Safeguarding Lead
- anonymous reporting (where available)
- trusted person or advocate
- external agencies (police, social workers, safeguarding teams)

All reports are:

- taken seriously
- recorded securely
- handled confidentially
- investigated proportionately
- protected from retaliation

9. Responding to Incidents

Bullying requires a prompt, proportionate and safety led response. Incidents can vary widely in severity, from early signs of exclusion to coercion, intimidation or exploitation, and may involve residents, young people, staff or contractors.

D2's response must balance fairness, trauma informed practice and risk management, ensuring that behaviour is addressed without destabilising accommodation or compromising workplace culture.

This section sets out how D2 assesses, investigates and responds to bullying concerns.



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9.1 Triage Approach

Concerns should be assessed as:

Low:	Conflict, misunderstanding, early signs of exclusion
Medium	Repeated behaviour, digital bullying, intimidation
High:	Coercion, exploitation, threats, staff–resident bullying, group bullying, safeguarding concerns

9.2 Staff and Contractors

Where bullying occurs between staff or contractors:

- concerns are reviewed by management
- HR or contractual processes may apply
- disciplinary action may be taken
- staff–resident bullying is treated as a safeguarding concern

9.3 Residents (Adults, Young People, UASC)

Where bullying occurs between residents:

- immediate safety is assessed
- concerns are recorded and escalated
- risk assessments are reviewed
- partner agencies may be engaged
- proportionate enforcement may apply (warnings, support plans, multi agency meetings)
- tenancy action is a last resort and agreed with commissioners

9.4 Resident–Staff Bullying

Where residents bully or intimidate staff:

- safety is prioritised
- boundaries are reinforced
- incidents are recorded
- safeguarding or ASB procedures may apply
- multi agency risk management may be required



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10. Support for Individuals

Bullying can have significant emotional, psychological and practical impacts on everyone involved. Victims may feel unsafe or distressed, while perpetrators may be acting from trauma, unmet needs or environmental stressors. Staff may experience anxiety, burnout or reduced confidence. D2's approach recognises these complexities and ensures that individuals receive appropriate support to restore safety, rebuild trust and prevent recurrence.

This section outlines the support available to residents, young people, staff and contractors.

Support may include:

- emotional reassurance
- advocacy or representation
- safety planning
- adjustments to accommodation or staffing
- referral to specialist services
- wellbeing support for staff

11. Training

Training is essential to ensuring that staff can recognise bullying, respond safely and uphold D2's organisational values. In accommodation settings, bullying may present subtly or escalate quickly; in workplace settings, it may undermine professionalism, boundaries and team culture. Effective training equips staff with the skills to identify early warning signs, manage conflict, use trauma informed approaches and follow correct reporting routes.

This section outlines D2's training expectations.

Training includes:

- recognising signs of bullying
- trauma informed responses
- digital conduct and online safety
- conflict de escalation
- safeguarding duties
- reporting and recording procedures



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12. Enforcement

Enforcement ensures that D2 can maintain safe accommodation, safe workplaces and safe communities. Bullying is not tolerated, and proportionate consequences are necessary where behaviour breaches occupancy agreements, workplace conduct standards or contractor expectations. Enforcement must be fair, consistent and aligned to safeguarding, HR and risk management principles.

This section explains how enforcement applies to residents, staff and contractors.

12.1 Employees

Breaches may result in:

- disciplinary action
- suspension
- dismissal

12.2 Contractors

Breaches may result in:

- removal from site
- reporting to employer
- contract review or termination

12.3 Residents

Breaches may result in:

- proportionate warnings
- increased monitoring
- multi agency risk management
- occupancy agreement enforcement



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13. Monitoring & Review

D2 monitors bullying concerns through:

- incident reporting
- safeguarding referrals
- ASB reviews
- staff feedback
- contractor performance
- learning reviews

This Policy is reviewed annually or sooner if legislation, risk or operational requirements change.

14. Version Control

Policy Owner:	Managing Director
Approval:	Senior Management Team
Date:	TBC
Tier:	2 – Operational Policy
Linked Policy Pillars (Tier 1):	Safeguarding HR Governance Whistleblowing Health & Safety Risk Management Data Protection Equality, Diversity & Inclusion
Review Cycle:	Annual

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