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**NATIONAL JOINT COUNCIL
FOR LOCAL AUTHORITY
FIRE AND RESCUE SERVICES**

**To: Chief Fire Officers
Chief Executives/Clerks to Fire Authorities
Chairs of Fire Authorities/PFCCs/Deputy Mayors
Directors of HR (Fire Authorities)**

Members of the National Joint Council

11 November 2025

CIRCULAR NJC/6/25

Dear Colleague

**PRINCIPLES FOR RESPONDING TO BULLYING, HARASSMENT,
DISCRIMINATION AND VICTIMISATION**

1. The Inclusive Fire Service Group (IFSG), a body led by the NJC for Local Authority Fire & Rescue Services, has produced a set of 10 principles for responding to bullying, harassment, discrimination and victimisation.
2. The principles, which are available on the [LGA website](#) and are attached to this circular as appendix A, have been developed jointly by both the employer and employee sides of the NJC.
3. We acknowledge and understand that each service will have their own policies and procedures which have been developed locally in line with the Acas code of practice and national conditions of service, in agreement with union representatives. These principles seek to supplement those arrangements already established rather than replace them. We hope that the principles will provide additional clarity and support to all parties concerned.
4. If you have any questions about the principles then please do contact firequeries@local.gov.uk

Yours faithfully

**Sarah Feeley
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Joint Secretaries of the Inclusive Fire Service Group**

Appendix A

Principles for responding to bullying, harassment, discrimination and victimisation.

As part of our ongoing work to ensure we have the right culture and behaviours across Fire and Rescue Services, the NJC has agreed **ten key principles** to support the handling of misconduct cases in relation to bullying, harassment, discrimination and/or victimisation.

The “Grey Book” provides minimum grievance and disciplinary procedures, as well as additional guidance, and each service will have their own policies and procedures which have been developed locally in line with the Acas code of practice, and in agreement with union representatives.

The following principles, which have been developed jointly by both the employer and employee sides of the NJC, provide additional clarity and confidence to all parties; those raising concerns, those who have had concerns raised about them, and those who are responsible for handling misconduct cases.

1. **Leadership accountability:** Leaders at all levels must model inclusive behaviour, challenge inappropriate conduct, and take swift action when issues arise.

Leaders must consistently model inclusive, respectful, and ethical behaviour, so that they create a culture where misconduct is less likely to occur and more likely to be addressed appropriately when it does.

Leaders must not only uphold standards themselves but also take prompt and fair action when issues arise. Their visible commitment to accountability and transparent handling of cases builds trust among employees, reinforces organisational values, and ensures that everyone—regardless of role—is held to the same high standards of conduct.

2. **Collective responsibility:** Creating a respectful and inclusive workplace is not solely the responsibility of leaders, it requires the active participation of everyone.

All employees, regardless of their role or seniority, play a part in shaping a workplace where inappropriate behaviour is actively challenged and eradicated.

This means creating a culture where all colleagues model positive behaviour and feel able to speak up when witnessing misconduct or inappropriate behaviour (whether in-person or online). Being a passive bystander can allow harmful behaviours to persist unchallenged.

Where trust in a relationship has broken down and needs to be repaired consideration should be given to informal action and exploration of restorative approaches (such as coaching or mediation) before progressing to formal action. While services should strive for consistency, there is also a need for judgement to ensure the right approach is being taken for each situation.

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3. **Working together:** Managers and trade unions need to work constructively together on these issues. If mutual trust can be developed between senior leaders, HR departments, management teams, and trade union representatives, this can really help so that even when views differ, communication can remain open and respectful and avoid unnecessary conflict.

Agreed ways of managing and responding to cases must be in place before they are needed. Employees involved in misconduct processes should engage with their unions early, share relevant information appropriately, and work together to uphold shared values of fairness, dignity, and respect in the workplace.

In cases of bullying, harassment, discrimination and victimisation, unions may also conduct their own internal investigations in relation to their own representation obligations (for example the FBU's All Equal All Different procedure). This is likely to run parallel to the service's investigation. Local agreements on how those investigations can run concurrently or consecutively would assist for when situations arise.

Unacceptable behaviour goes against both FRS codes of conduct and many trade union membership rulebooks, so it is useful to recognise that representing members alleged to have harmed others does not mean union representatives condone that behaviour. The role of the union representative will be to ensure that their members are supported and to ensure those cases are being heard fairly and in line with procedures, regardless of personal opinion in relation to the case.

4. **Effective training:** When training is well-designed and regularly updated, it reinforces organisational values, supports legal compliance, and empowers all employees to contribute to a positive working environment. Regular mandatory training should be provided to all employees on recognising inappropriate behaviour and what to do if they witness something (including online).

Effective training should be provided to prepare managers with the knowledge and confidence to handle misconduct appropriately and fairly, including understanding how the processes work, what the various stages are, and their responsibilities within those processes.

Trade union representatives should have an understanding of local processes and procedures and will also be offered appropriate training through their respective trade union, in accordance with local facilities agreements.

5. **Robust processes:**

Having clear, accessible, and well-communicated reporting mechanisms is essential to ensure that all employees feel safe and confident in raising concerns. These mechanisms must be easy to use, ensure confidentiality, and be supported by a culture that encourages speaking up and seeks to continually improve.

Once a concern is raised, it is vital that the investigation process is timely and fair. This must include clearly defined steps, consistent application of procedures, and regular communication with those involved. Reasons for delays to an investigation should be communicated regularly to affected parties, with indications for how long processes can be expected to take

FRS should appoint a suitable manager to carry out the investigation. In some circumstances it may be appropriate to use external investigators with the necessary skills, qualifications and experience to support an independent investigation. The NJC recommends FRSs engage in early discussions with their union representatives about the rationale for appointing an external investigator. They should ensure that responsibility for the investigation ultimately remains within service and that the process aligns with the Grey Book. The importance of impartiality and objectivity should be emphasised for both internal and external investigators.

No one should suffer a detriment for reporting incidents of misconduct or supporting another employee to do so. Any complaint that is found to be, after a thorough and robust investigation, vexatious or intended to cause harm, either as an act of victimisation or otherwise, may be dealt with as a disciplinary issue.

Cases need to be heard at the appropriate level. While recognising that not all cases will require a formal procedure all incidents need to be addressed to ensure transparency for those involved so that nothing is swept under the carpet. Ignoring small issues sends the wrong message and can discourage employees from speaking up so a consistent and pragmatic balance needs to be found.

6. Identify recurring patterns

Sometimes individual incidents may feel trivial, but may form part of a broader pattern of behaviour that can signal a more serious issue. Harassment is not always one obvious and large incident but can be a collection of repeated or seemingly trivial issues that taken together make amount to unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Likewise, if there are clusters of cases, or a notable variance in an employee survey, that may signal a deeper problem or culture that needs tackling.

7. **Providing support for everyone:** Support services should be made available to all employees involved in misconduct processes. Victims must be protected from further harm or retaliation whilst assumptions should not be made about those accused in advance of procedures having been followed. They are entitled to feel safe and heard.

A victim/survivor of harm receiving support from a union official will also need support from their employer. This support may include access to occupational health, counselling, and peer support.

Individuals accused of misconduct should also be treated with dignity and offered appropriate support, including clear information about the process and access to guidance.

8. **Balancing confidentiality and victim communication:** Maintaining confidentiality is essential to protect the rights and privacy of all individuals involved. However, it is equally important to ensure that the person who raised the concern feels heard and supported.

While specific details of outcomes cannot usually be shared, complainants can be privately provided with reassurance that their concern has been taken seriously, that an appropriate process has been followed, and any necessary actions which will be taken as a result. This is in line with both Acas and Equality and Human Rights Commission (EHRC) guidance.

[EHRC say](#) "To be effective in encouraging those with complaints to come forward, the outcome to a formal complaint ...should be as transparent as possible... This means that wherever appropriate and possible, if a complaint is upheld then the complainant should be told what action has been taken to address this including action taken to address the specific complaint and any measures taken to prevent a similar event happening again in the future. If the complainant is not told what action has been taken, this may leave them feeling that their complaint has not been taken seriously or addressed adequately".

This helps build trust in the system and demonstrates that the organisation is committed to addressing misconduct fairly and transparently, without compromising the confidentiality of others.

9. **Continuous Improvement:** Fire and Rescue Services must regularly review policies, procedures, and workplace culture alongside trade unions to identify areas for improvement.

Feedback from employees and lessons learned from incidents should inform meaningful change. This includes joint learning from past incidents and identifying patterns or gaps.

By embedding a culture of learning and responsiveness, organisations demonstrate their commitment to progress and accountability, and ensure that their approach to misconduct remains robust, fair, and fit for purpose.

10. **Legal compliance:** All actions must comply with the Equality Act 2010, the Acas Code of Practice on Grievance and Disciplinary Procedures and other relevant legislation.

As public sector organisations, FRSs have a legal duty to eliminate discrimination, harassment, and victimisation; advance equality of opportunity; and foster good relations between individuals with and without protected characteristics.

This includes ensuring that policies and procedures comply with relevant legislation are transparent and applied consistently. Upholding these legal standards not only protects individuals' rights but also strengthens public trust and organisational credibility.