

Preventing Bullying and Harassment Policy

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EXECUTIVE SUMMARY

The Trust acknowledges that bullying & harassment can often be hard to recognise, insidious and destructive. The Trust is therefore committed to this policy and recognises that all its employees have a right to a working environment free from bullying and harassment and emphasises that bullying and harassment will not be tolerated and allegations will be treated seriously.

The communication of this policy to all employees irrespective of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status is the responsibility of all managers and supervisors.

This policy is intended to eliminate all forms of offensive, improper and inappropriate behaviour which is distressing to the recipient and may affect effectiveness at work. Bullying and harassment can adversely affect job performance, leads to stress, anxiety and sick absence. When not dealt with bullying and harassment can adversely affect service delivery and patient care.

All employees regardless of status have a personal and legal responsibility not to behave in a manner that could be offensive to others. Employees also have a personal responsibility to contribute to an environment which is free from harassment by challenging offensive behaviour in others and reporting incidents appropriately.

The aim of this policy is to draw attention to and, thereby prevent all forms of offensive behaviour.

1. PURPOSE

1.1 It is the policy of the Trust to provide a working environment free from bullying and harassment and any other form of unacceptable behaviour that is personally offensive to an individual member of staff or groups of staff irrespective of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status.

1.2 This policy aims to ensure that:

- all employees are aware of the types of behaviour which may constitute bullying and harassment and their responsibilities for preventing and reporting such behaviour.
- all employees understand that bullying and harassment is intolerable and unacceptable and that disciplinary action will be taken against offenders.
- all employees understand that bullying is not acceptable and that harassment on the basis of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status is unlawful.
- arrangements are in place whereby complaints can be investigated in a manner which recognises the sensitivity of the issues raised and the rights of both parties.
- that all allegations of bullying and harassment are responded to promptly and with the complainant's confidentiality protected as far as possible.
- essentially, the policy aims to promote a climate in which employees feel able to bring forward complaints of bullying and harassment without fear of victimisation.

1.3 Failure to follow this policy could result in the instigation of disciplinary procedures.

2. DEFINITIONS

2.1 Bullying – can be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

2.2 Harassment - may be by an individual against another individual or involve groups of people. It may be obvious or insidious. Whatever form it takes, it is unwarranted and unwelcome to the individual. It is unwanted conduct affecting the dignity of men and women in the workplace. It may be related to any personal characteristic, but if it is related to age, gender (including transgender), sexual orientation, disability, religion, ethnicity, race or nationality it is unlawful. The key is that the action or comments are viewed as demeaning and unacceptable to the individual. (A list of examples is provided at appendix A).

3. DUTIES WITHIN THE ORGANISATION

3.1 All employees will:-

- Treat colleagues with respect and dignity (colleagues are defined as all staff regardless of their role in the organisation) taking into account different cultural, religious and social needs.
- Act in ways that supports equality and values diversity in the workplace in keeping with the core dimensions of the Knowledge and Skills Framework (KSF).
- Recognise and report offensive and inappropriate behaviour
- Conduct themselves in such a manner so as not to be accused of bullying or harassment by anyone whilst at work
- Be personally liable for any behaviour that causes harassment to another in the workplace
- Understand their responsibilities at work and can expect to be managed by the appropriate manager, this will involve positive engagement in discussions about performance at work

3.2 Directors/ Divisional General Managers/ Directorate Managers/ Business Managers/ Managers and Supervisors will:-

- Ensure through their own actions remarks or behaviour that they do not conduct themselves in a manner which may be perceived as bullying or harassment by other employees
- Ensure that all employees are appropriately inducted into the organisation and that expectations, responsibilities, role and work standards are made explicit
- Ensure that the Trust's Preventing Bullying and Harassment policy is implemented within their area of responsibility
- Treat each allegation of bullying or harassment seriously and sympathetically
- Develops a culture that promotes equality and values diversity (in line with the KSF) framework.
- Contact HR representative or an employee assistance advisor for advice and assistance in handling bullying or harassment allegations and /or departure from this policy
- Ensure all staff are aware of types of behaviour which may be regarded as bullying and harassment in the workplace
- Ensure that regular training sessions are held for managers and new employees to appraise them of the policy and reporting procedure

3.3 Staff Side Representatives will:-

- Provide support and advice to members in facilitating the policy
- Work in partnership with Managers and HR Representatives to ensure all employees are treated fairly and consistently, irrespective of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status, and taking into account different social, cultural or religious needs.
- Represent their members in the workplace at formal stages of the Disciplinary Procedure

3.4 The Director of HR will:-

- Ensure that the policy is reviewed and amended as necessary
- Ensure that Employee Assistance Advisers are recruited and trained to advise employees who suffer from bullying and harassment, and also employees who are accused of bullying or harassment
- Be responsible for monitoring the effectiveness of the policy through the annual staff survey, workforce reports and Employee Assistance Advisers.

4 PROCEDURE FOR DEALING WITH COMPLAINTS OF BULLYING AND HARASSMENT

4.1 GENERAL PRINCIPLES

- 4.1.1 The Trust places great importance on protecting the dignity of all its employees at work and is working to eliminate all forms of offensive behaviour.
- 4.1.2 Complaints will be dealt with fairly and consistently.
- 4.1.3 Allegations of complaints of harassment will be taken seriously and properly investigated.
- 4.1.4 Allegations of complaints of harassment which are subsequently found to have been made maliciously will be investigated and will result in disciplinary action being taken.
- 4.1.5 All efforts will be made to guard against victimisation of the complainant.
- 4.1.6 The procedure allows for a reasonable attempt to resolve the matter informally without recourse to formal action.
- 4.1.7 Where any allegations are proven through investigation, formal procedures will be instigated and disciplinary sanctions applied in accordance with the Trust's Disciplinary procedure.
- 4.1.8 The Trust recognises the stress, anxiety and distress that bullying and harassment (and accusations of such) may cause and appropriate confidential support will be made available to staff at all stages of the procedure.

4.2 REPORTING THE PROBLEM

- 4.2.1 A member of staff who believes that they are being bullied or harassed contrary to the Trust's Bullying & Harassment Policy may initially approach their line manager, their line manager's manager, Employee Assistance Advisor, HR Representative or their Staff Representative for advice on how to proceed or simply talk to a colleague in confidence.
- 4.2.2 A member of staff wishing to make a formal allegation should contact their line manager, line manager's manager or an HR Representative. The manager may at this stage decide that the matter should be formally investigated.

- 4.2.3 The member of staff will also be offered the contact number of a Employee Assistance Advisor who can offer support to the individual and advise them of other appropriate support should this be required.
- 4.2.4 To help monitor and evaluate the procedure, a record of incidents of bullying and harassment and if appropriate, a record of any discussions at this stage will be kept securely and confidentially in a locked cabinet. Employee Assistance Advisors will ensure that any records are kept securely.

4.3 INFORMAL STAGE

- 4.3.1 The informal stage of the process, seeks to resolve the matter as close to the source as possible. Using advice from the line manager, HR Representative, Employee Assistance Advisor and Staffside Representative, an individual who is claiming bullying or harassment will be supported and offered mediation as a method of resolution.
- 4.3.2 With appropriate support the member of staff may approach the alleged bully/ harasser and attempt to resolve the matter by explaining why their behaviour is causing offence/distress and ask them to change their behaviour.
- 4.3.3 If a member of staff does not feel able to meet with the alleged bully/harasser in person, they may set out their concerns in writing and the HR Representative will discuss these with the alleged bully/harasser. Staff may choose to involve their line manager at this stage.
- 4.3.4 The person accused of bullying or harassment will be offered the opportunity to meet with a Employee Assistance Adviser for support.
- 4.3.5 It is important that while the matter is managed informally, those involved recognise their responsibility and obligation to ensure that the matter is resolved. Where this is not possible, or if agreement cannot be reached on a resolution to the matter through the informal approach, or if the problem continues after an agreed resolution, the matter will be referred to the appropriate line manager to investigate under the Trust's Conduct and Disciplinary Procedure.

4.4 FORMAL STAGE

- 4.4.1 Where an attempt has been made to resolve the matter informally but this has not been successful, the matter will be escalated to the appropriate Head of DMT who will ensure that an investigation under the Trust's Conduct and Disciplinary Procedure will take place. Investigations will remain confidential and be on a need to know basis only.
- 4.4.2 In the event of the matter being more serious or is a repeated occurrence it will immediately be escalated to the formal stage and the appropriate Head of DMT will ensure that the matter is investigated under the Trust's Conduct and Disciplinary Procedure. If the

immediate line manager has not previously been involved they will be notified at this stage.

- 4.4.3 The member of staff and the alleged bully/harasser have access to an Employee Assistance Adviser for personal support.
- 4.4.4 Where it is deemed to be appropriate, the alleged bully/harasser will be removed from the immediate working environment. This may include transfer to another area or suspension from work in accordance with the Trust's Conduct and Disciplinary Procedure. In exceptional circumstances the member of staff may be moved but it is recommended that this is only done in consultation with the individual following advice from an HR Representative.
- 4.4.5 During the investigation, a designated person (e.g. Lead Investigating Officer or Line Manager) will be identified to liaise with the alleged bully/harasser and where appropriate keep them informed of the progress of the investigation.
- 4.4.6 Regular contact will be made by the Lead Investigating Officer with both the complainant and the alleged bully/harasser throughout the investigation. Regular contact is considered to be fortnightly as a minimum.
- 4.4.7 The decision on how to proceed will be taken by the Head of DMT (for consistency) with advice from the HR Representative.
- 4.4.8 Following the conclusion of a case, the manager will be responsible for ensuring there is a planned return to work for both complainant and (where appropriate) the alleged bully/harasser. Ongoing support for both parties may be required.
- 4.4.9 In cases where the identity of the alleged 'bully/harasser'(s) is not known, the complaint will still be investigated based on information available. The HR Representative will advise the appropriate manager as to whether any other investigation (e.g. involving the police) should be carried out. If the safety of the member of staff is felt to be at risk in such circumstances, consideration will be given where possible to transferring the individual with their consent to an alternative location.
- 4.4.10 Any subsequent disciplinary action will be taken in accordance with the Trust's Conduct and Disciplinary Procedure. Where a possible criminal offence is disclosed, the police may also be involved.
- 4.4.11 Any subsequent right of appeal will be in accordance with the Trust's Appeals Procedure.

4.5 TIME SCALES

- 4.5.1 Informal Stage - If the member of staff is not satisfied with the outcome of the informal approach the matter should be referred to the formal procedure within 15 days of the action taken by the line manager or HR Representative

- 4.5.2 Formal Stage – Once the formal stage of the procedure has begun an investigation should be started within 5 working days of the Head of DMT being notified it is up to the Head of DMT to identify a Lead Investigating Officer. If exceptionally an investigation cannot be started within 5 working days, the Head of DMT should notify the member of staff and keep them informed of progress and actions taken.
- 4.5.3 The investigation itself should not normally take longer than one calendar month from the start. In exceptional circumstances investigations may take longer than this however all parties will be kept informed of progress. Once the investigation is completed any disciplinary action to be taken will be in accordance with the Trust Conduct and Discipline Policy and follow the time scales laid out in that policy.

5 EQUALITY IMPACT ASSESSMENT

- 5.1 The Leeds Teaching Hospitals Trust is committed to ensuring that the way that we provide services and the way we recruit and treat staff reflect individual needs, promote equality and does not discriminate unfairly against any particular individual or group.
- 5.2 The development of Trust policies must comply with equalities legislation which is to promote equality and eliminate unlawful discrimination. Guidance on Equality Impact Assessment of policies is available on the Trust intranet.
- 5.3 Appendix F is an Equality Impact Assessment table for the policy.

6 CONSULTATION AND COMMUNICATION WITH STAKEHOLDERS

- 6.1 This policy for the Prevention of Bullying and Harassment has been subject to extensive consultation and discussion with staff side. It is the outcome of a working group which is a sub-group of the Trust Negotiation and Consultation Committee (TCNC) which includes members of both management and staff side.
- 6.2 The policy has gone out to consultation to the following groups:
- Staff Side Council
 - Trust Management Groups
 - Diversity Action Group (now disbanded)

7 PROCESS FOR REVIEW/REVISION

The policy will be reviewed two years from the date of approval. The lead director will be responsible for agreeing the process with the TCNC.

8 COMMUNICATION AND DISSEMINATION

8.1 Following approval, the policy will be notified to the target groups named on the front page of the policy in the reference box, as follows:

8.1.1 **Directors** – communication directly by e-mail and discussion at SMT

8.1.2 **Senior operational and corporate managers** – communication directly by e-mail and to be notified by Directors through line management briefing

8.1.3 **All staff** – Trust communications channels including e-Bulletin, Bulletin and TalkBack online discussion forum.

9 IMPLEMENTATION AND TRAINING

9.1 The effective date will be immediate.

9.2 Recruitment and training for Employee Assistance Advisers will remain ongoing.

9.3 In line with the LTHT Mandatory Training Policy every employee is required to attend the corporate induction day and also receive a local induction. Both corporate and local induction make reference to the Trusts Bullying and Harassment Policy.

9.4 Half day awareness sessions, which will be promoted via the e-bulletin and intranet, are open to any member of staff to attend. These sessions explore what is meant by the terms bullying and harassment and draw the distinction between these inappropriate behaviours and performance management. They will signpost staff that may have been affected to the support that is available within the Trust.

9.5 Where a significant risk of bullying or harassing behaviour has been identified, either through staff survey results or through individual allegations, bullying and harassment training becomes mandatory (see Mandatory Training Policy). Training is provided by the HR Service and managers should contact their HR advisors to arrange it.

9.6 The training lead ensures that the content of training sessions/e-learning meets legal and statutory requirements and that presenters are available to conduct face-to-face training. He/she ensures that attendance at training relating to their lead area is input to ESR. He/she is also responsible for ensuring that any related policies refer to the requirement for appropriate training. In respect of booked face-to-face courses, training leads must ensure that the line manager is made aware of any member of staff that fails to attend, or fails to complete their booked training event.

9.7 In Line with the Mandatory training Policy all staff complete relevant risk-specific training as assessed by their line manager.

10 MONITORING COMPLIANCE AND EFFECTIVENESS

10.1 This policy will be monitored through the following mechanisms:

10.1.1 The annual Staff Survey will ask specific questions on bullying and harassment in the workplace.

- 10.1.2 The Employee Staff Record System (ESR) will record all grievances and bullying and harassment allegations.
- 10.1.3 The number of people who access the Employee Assistance Advisers and the nature of their enquiry will be recorded.
- 10.1.4 The number of people who access the mediation service will be recorded and monitored.
- 10.1.5** Annual workforce reporting will monitor the number of formal allegations of bullying and harassment.
- 10.2 Line managers assess the risk associated with bullying and harassment in their work area, using observation and data derived from health and safety audits, incident reports and staff survey results. They must also ensure that the requirement to attend relevant training is included in Personal Development Plans and is completed within a timescale commensurate with the level of risk, chasing non-attendance, escalating issues and implementing disciplinary procedures where necessary.
- 10.3 The mandatory training report co-ordinator within education, learning and development reports monthly from ESR on completion of the above training to the Head of ETD and Divisional HR Managers.
- 10.4 Divisional General Managers, corporate directors, Divisional HR Managers and Directorate Managers ensure that these requirements are being followed within their area and are held to account through the Assurance Management System. Directorate Managers should assess the level of compliance risk declared within the AMS based on the extent to which managers and supervisors are discharging their duties. The appraisals spreadsheet provides details of PDP development and review. This should be supplemented by quarterly random audit of a sample of PDPs to ensure that mandatory training requirements are recorded, and that attendance is monitored through to completion.
- 10.5 Particular attention will be paid to monitoring allegations and outcomes on the grounds of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status.
- 10.6 The policy will be indicated as failing if the number of people requiring a disciplinary sanction for bullying and/or harassment increased. This would be determined by information from the ESR monitoring reports. If a trend was identified that indicated an increase in the number of proven bullying and harassment cases high risk areas would be identified through the ESR records and specific training would take place in line with the training plan outlined above.

11 REFERENCES/ASSOCIATED DOCUMENTATION

The Trusts Disciplinary and Conduct Policy and Procedure
The Trusts Appeals Procedure
The Trusts Equality and Diversity Policy

EXAMPLES OF INAPPROPRIATE BEHAVIOUR

The following list provides some examples of inappropriate behaviour covered by this policy, it should be noted that this list is not exhaustive.

- Spreading malicious rumours at work or insulting someone through behaviour
- Intimidation or malicious behaviour towards others
- Unfair treatment of others
- Ridiculing or demeaning someone - picking on them or setting them up to fail
- Copying written documents or email which is critical of someone to others who do not need to know
- Exclusion or victimisation
- Abuse of power or unfair sanctions
- Unwelcome sexual advances i.e. touching, standing too close, the display of offensive materials
- Unwelcome comments or abusive language which may be gender or race based or which refers to a person's age, religion or personal appearance
- Making threats or comments about job security
- Deliberately undermining a competent worker with work overload and/or persistent criticism
- Preventing individuals progressing by intentionally blocking promotion or training opportunities

PROTECTION FROM HARASSMENT ACT (1997)

Within the Protection of Harassment Act, it is the target's perception of the harassment rather than the perpetrator's alleged intent, which is significant.

This Act might be of use if the harasser regularly harasses you (or a member of your family), making regular phone calls to you at home when you are on leave, especially if the calls are at unsociable hours. Breach of confidentiality could be regarded as an act of harassment, as could denial of an employee's right to representation at meetings, etc. Making unfounded criticisms, allegations or accusations and refusing to substantiate them in writing with substantive and quantifiable evidence is also harassment. It is advisable to keep a diary of events.

The Department of Trade and Industry recommend using the Protection from Harassment Act against bullies in the workplace, although in reality the Act is to deal with stalkers.

VICARIOUS LIABILITY

In a recent court judgement (Majrowski v Guy's and St Thomas's NHS Trust) it was found that an employer could be vicariously liable under the Protection from Harassment Act 1997 s.3 for its employee's breach of duty under s.1 of the Act, not to subject another person to harassment.

This judgement highlights the importance of the requirements covered within the Roles & Responsibilities section of this policy. It is vital that all employees who are aware of inappropriate behaviours act to ensure that the matter is addressed appropriately.

ROLE PROFILE - EMPLOYEE ASSISTANCE ADVISOR

Role Purpose:

To provide upon request support and advice on options available to employees who are or think they are experiencing personal harassment or bullying.

To provide advice of options available and support to employees who have been accused of harassment or bullying.

Key Areas of Work:

To act as a point of contact for employees who are experiencing or think they are experiencing harassment or bullying.

To act as a referral point for specialist advice including, where appropriate, to refer to other agencies.

To provide support and advice to an employee who has been accused of harassment or bullying

Values

Demonstrate respect and understanding for the issues impacting on people from a range of backgrounds, beliefs and values.

A non judgmental approach to the role

A commitment to challenging harassment or bullying in the workplace

Skills required

- Demonstrate ability to listen
- Demonstrate ability to express ones self
- Demonstrate an ability to deal with stress appropriately
- Ability to convey empathy
- Demonstrate open and non-judgmental attitudes
- Ability to be aware of, and deal with own personal issues/vulnerability
- Ability to reflect on their own experiences
- Demonstrate the ability to work within Trust policy and practices including confidentiality.
- Ability to participate in a group discussion

USEFUL CONTACTS

In addition to the Trust's Employee Assistance Advisers, the following links may be useful as a starting point for further information. This list is not exhaustive and most professional bodies and trades unions offer advice and information:

www.acas.org.uk/index.aspx?articleid=797

www.dti.gov.uk

www.amicustheunion.org

www.bma.org.uk/ap.nsf/Content/bullying2006

www.rcn.org.uk/publications/pdf/bullying-managers-guide.pdf

www.rcm.org.uk

www.unison.org.uk/file/13

Level 1

Reporting the Problem

This is the first step for people who believe they are being harassed or bullied

1. Approach either your line manager, Senior HR Adviser, Employee Assistance Adviser or Staff Representative.
2. If you wish to proceed contact your Senior HR Adviser.
3. You will be offered the support of an Employee Assistance Adviser.
4. To help monitor and evaluate the procedure a record of incidents is kept.

A copy of the policy and procedures for Preventing Bullying and Harassment in the Workplace can be obtained from your Line Manager, HR Department or the Trust Intranet.

Level 2

Informal Procedure

1. If all parties agree an attempt will be made to resolve the matter informally.
2. If a member of staff does not feel able to meet with the alleged bully/harasser in person, they can set out their concerns in writing and the Senior HR Adviser will discuss this on their behalf.
3. If an agreement cannot be reached on a resolution to the matter through this informal approach, the Senior HR Adviser will refer the matter to an appropriate line manager to investigate under the Trust Disciplinary Procedure.

Level 3

Formal Procedure

1. If the matter is more serious or a repeated occurrence, the Senior HR Adviser will refer the matter to the relevant manager who will instigate an investigation under the Trust Disciplinary Procedure.
2. The member of staff and alleged bully/harasser have access to an Employee Assistance Adviser for personal support.
3. Where it is felt appropriate, the alleged bully/harasser will be removed from the immediate work environment.
4. A formal investigation will take place; any subsequent disciplinary action will be taken in accordance with the Trusts Disciplinary Procedure. Where a possible criminal offence is disclosed, the police may also be involved.

Appendix F

Equality Impact Assessment – Trust policies and functions must comply with equalities and human rights legislation which briefly is to promote equality and human rights and eliminate unlawful discrimination.

Name of policy or function: Prevention of Bullying and Harassment Policy		Lead Person: Jackie Green, HR Director	
1. Screening How relevant is this function or policy and its associated procedures to promoting equality and human rights and to eliminating discrimination? (indicate in boxes below)			
	Not relevant	Partly relevant (which parts?)	Very relevant
Race/ethnic group:			Very relevant
Disability ¹ :			Very relevant
Gender (including transsexuals):			Very relevant
Age:			Very relevant
Sexual Orientation:			Very relevant
Religion:			Very relevant
Human rights ² :			Very relevant
Carers or other group (please state):			Very relevant
2. Assessing Impact :To be completed where the policy and associated procedures or the function has been determined as relevant in the screening process above			
Please specify, in the rows below, anything that you have included or done to ensure that equality and human rights are promoted and that no one will be unlawfully disadvantaged (discriminated against) as a result of this policy or function			
Race/ethnic group:	<p>Additional statements have been added to the policy to highlight that treatment should be irrespective of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status.</p> <p>Additional statements have been added to the policy to highlight that bullying or harassment on the grounds of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status is unlawful.</p> <p>When there is a requirement for mandatory Equality and Diversity training is highlighted in the policy.</p> <p>As part of the monitoring process the need to pay particular attention to allegations and outcomes raised on the grounds of race, ethnic group, religion/belief, impairment, age, gender, sexual orientation or mental health status has been highlighted.</p>		
Disability:			
Gender (including transsexuals):			
Age:			
Sexual Orientation:			
Religion:			
Human Rights:			
Carers or other group (please state:)			

¹ Disability covers physical, sensory and mental impairments which include mental illness and learning disability. Long term conditions such as cancer, HIV and Multiple Sclerosis are included and any other condition at the point at which it begins to have an impact on a person's capacity to carry out normal day to day activities.

² To comply with human rights legislation a policy or function must, where possible, promote (in addition to equality), dignity, respect, fairness and autonomy

