



## **ANTI-HARASSMENT AND BULLYING POLICY**

### **1. About this policy**

- 1.1 EFT International is committed to providing a working environment free from harassment and bullying and ensuring that everyone within the organisation is treated and treats others, with dignity, compassion and respect.
- 1.2 This policy covers harassment or bullying which occurs both at the workplace and out of the workplace, such as at EFT International work-related events or social functions. It covers bullying and harassment by staff (which for the purposes of this policy may include consultants, contractors, trustees, executives, volunteers and agency workers) and also by third parties such as customers or suppliers.
- 1.3 This policy applies to all employees, officers, trustees, consultants, self-employed contractors, casual workers, agency workers and volunteers. It does not form part of any contract of employment or contract to provide services, and we may amend it at any time.

### **2. What is harassment?**

- 2.1 Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.
- 2.2 It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 2.3 Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

2.4 Harassment may include, for example:

- (a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- (b) continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- (c) sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- (d) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- (e) racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- (f) outing or threatening to out someone as gay or lesbian;
- (g) offensive emails, text messages or social media content; or
- (h) mocking, mimicking or belittling a person's disability.

2.5 A person may be harassed even if they were not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

### **3. What is bullying?**

3.1 Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

3.2 Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- (a) physical or psychological threats;
- (b) overbearing and intimidating levels of supervision;
- (c) inappropriate derogatory remarks about someone's performance;

3.3 However, legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers or volunteers in the course of their employment, will not amount to bullying on their own.

#### **4. If you are being harassed or bullied: informal steps**

- 4.1 If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to your team leader who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel either uncomfortable or unable to speak to your team leader, possibly because the complaint concerns him or her, then you should communicate your concerns to the Volunteer Director. If this does not resolve the issue, you should follow the formal procedure below.
- 4.2 If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your team leader or the Director of Volunteering informally for confidential advice.
- 4.3 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below.

#### **5. Raising a formal complaint**

- 5.1 If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your team leader. If the matter concerns your team leader, you should submit it to the Director of Volunteering.
- 5.2 Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

#### **6. Formal investigations**

- 6.1 We will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it.
- 6.2 We will arrange a meeting with you in person or via video conference call, usually within two weeks of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague of your choice, who must respect the confidentiality of the investigation.
- 6.3 It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
- 6.4 At the end of the investigation, a report will be submitted to the Volunteer Director. S/he will arrange a meeting with you, usually within 2 weeks of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague to

the meeting. A copy of the report and the findings will be given to you and to the alleged harasser.

## **7. Action following the investigation**

- 7.1 If the investigation determines that harassment or bullying has occurred, prompt action will be taken to address it.
- 7.2 Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location, working pattern or reporting lines of one or both parties.
- 7.3 Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to disciplinary action.

## **8. Appeals**

- 8.1 If you are not satisfied with the outcome you may appeal in writing to the Board of Trustees stating your full grounds of appeal.
- 8.2 We will hold an appeal meeting, normally within two weeks of receiving your written appeal. Where practicable, the appeal hearing will be conducted by members of the Board of Trustees who had not been previously involved in the case. You have the right to bring a colleague to the meeting.
- 8.3 We will confirm our final decision in writing, usually within two weeks of the appeal hearing. This is the end of the procedure and there is no further appeal.

## **9. Protection and support for those involved**

Volunteers who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action. If you believe you have suffered any such treatment you should inform your team leader or Volunteer Director.

## **10. Confidentiality and record-keeping**

- 10.1 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action.

10.2 Information about a complaint by or about an employee/volunteer may be placed on both parties' personnel files, along with a record of the outcome and of any notes or other documents compiled during the process.