

HOMES FOR LIFE HOUSING PARTNERSHIP

Dignity at Work Policy

Date Issued:	November 2014 (Version 2)
Due review Date:	November 2019
No. of Pages:	15 (including signing sheet)
Objective:	To describe the Company's policy & procedure with regards to Dignity at Work
Responsible:	Administrator

1.0 Introduction

Throughout the guideline the terms bullying and harassment will be used together to ensure that all possible perceptions of such actions are covered. However, in general terms, Homes for Life wish to ensure that any incident or behaviour which is deemed unacceptable by the recipient is covered whether explicitly stated within the definitions contained within various sections of this policy and procedures or not.

Given the often complex and sensitive issues which are associated with bullying and harassment simply adhering to these guidelines will not ensure that the outcome will be perceived to be successful by all who are involved. However, by using the guidelines Homes for Life can be satisfied that they are adopting best practice principles when dealing with these complex issues.

In addition to bullying and harassment of, among and by staff, the guideline also deals with bullying and harassment by members of the public, Directors, contractors and staff from other agencies. It is recognised that the latter area has significant legal and ethical implications for organisations that may have differing views on how they should be dealt with. What is clear is that provision ***must*** be made within organisations to deal with this issue when it arises and that staff must know the procedure which is available to them in each situation.

2.0 The Need for a Guideline

Evidence obtained from recent surveys suggests that over 1 in 5 employees (21%) report they have been bullied at least once during the past year. This survey covers a sample of over 3,500 British workers of different grades and seniority. The research also reveals that almost 1 in 10 employees (8%) say they have been bullied on several occasions, while 2% report they have been bullied six or more times in the past year. Employers have a duty under the Health and Safety at Work Act to ensure the health, safety and welfare of their employees. Any breach of this duty, such as the failure to prevent serious bullying, would entitle victims to resign and claim constructive dismissal. Or, if this behaviour is directed at people because of their sex, disability or

race, victims may have a potential claim for harassment under current discrimination legislation.

Bullying and harassment take many forms, occur for a variety of reasons and may be directed at individuals or groups. Due to the fact that bullying and harassment are often misunderstood, badly misinterpreted and largely unrecognised in the workplace, it is necessary to have written definitions to appreciate the nature of the behaviour. Not only is bullying a serious moral issue, but it has strong implications for business performance. Peak levels of motivation are achieved in a culture defined by respect and recognition, not humiliation and intimidation.

Bullying and harassment impact upon the individual/group being harassed, on their colleagues and on the organisation as a whole. Intimidation in any form leads to under-performance at work. If ignored, incidents of bullying and harassment lead to, and perpetuate, a working environment in which it is unpleasant to work. People cannot contribute their best or work well in teams when they fear bullying, harassment or abuse. Bullying and harassment cause much avoidable demoralisation, stress, anxiety and sickness. There are also hidden psychological and social effects on the person being bullied or harassed as well as their family and friends.

The cost of bullying and harassment to an organisation can be looked at in terms of under performance, sickness and absence rates, costs of recruiting and retraining staff, legal action and tribunal proceedings (with unlimited compensation in sex, race, disability and protected disclosure cases) and possible loss of public image. The Dignity at Work Policy applies to everyone and you have a responsibility to be alert to bullying and harassment when it occurs. Unacceptable behaviour must not occur and, when it does, must not be allowed to continue unchecked. Inaction is not an option.

This guideline contains current principles of best practice to help Homes for Life to begin the process of reviewing current policies and procedures to ensure that the arrangements which they have in place are based on sound practice and to amend their policies and procedures as necessary.

3.0 Legal Framework/Relevant Legislation

The relevant statutes or regulations which can be used against either the bully or harasser, the organisation or both are detailed below, however bullying in itself is not actionable by law.

Health and Safety at Work etc Act 1974 (Sections 2 and 3) and the Management of Health and Safety at Work Regulations 1992 and similar legislation. This legislation places a duty of care on employers to ensure the Health and Safety of their employees, and to conduct assessments of potential risks to employees and to take appropriate remedial action. This may extend to acts by people over whom the employer has no direct control but, whom the employer might have reasonably foreseen the potential for harassment.

Employment Rights Act 1996 - This legislation gives employees the right to access an employment tribunal where they believe they have been "constructively dismissed". This may apply, for example, where an organisation has failed to take appropriate action to deal with a complaint of bullying or harassment.

Sex Discrimination Act 1975 and Race Relations Act 1976 - This legislation may be used by the employee where the bullying or harassment has a sexual or racial basis. The employer can be held vicariously liable, even when it is unaware that such incidents have taken place.

Protection from Harassment Act 1996 - This legislation which was developed to cover "stalking" cases, enables employees to take a civil case where they believe a colleague's conduct amounts to harassment.

Disability Discrimination Act 1995 - This legislation makes it unlawful to discriminate against a disabled person at work on account of their disability.

Public Interest Disclosure Act 1998 - This legislation was developed to protect so-called "whistle-blowers". Where any employee is dismissed because he or she made a "protected disclosure", the dismissal will be deemed automatically unfair.

4.0 Policy Statement on Bullying and Harassment at Work

Homes for Life are committed to provide a working environment which is free from harassment, bullying or intimidation of any nature. Every employee of the organisation has a responsibility to treat colleagues with dignity and respect irrespective of their sex, race, marital or health status, age, disability, sexual orientation, religion, political conviction, membership or non-membership of a trade union/professional organisation or real or suspected infection with HIV/AIDS. Reprehensible behaviour is not acceptable.

As well as applying to all staff directly employed it will also apply to agency staff, contractors, Directors, staff from other organisations and any other person who has access to the organisation's premises.

Homes for Life defines bullying, as "persistent unwelcome behaviour, mostly using unwarranted or invalid criticism, nit-picking, fault-finding, also exclusion, isolation, being singled out and treated differently, being shouted at, humiliated, excessive monitoring, and much more".

Acts of harassment usually centre around unwanted, offensive and intrusive behaviour

The organisation views bullying and harassment as serious or gross misconduct, dependant upon the circumstances, which will be subject to action under the disciplinary procedure. In addition, to intentionally harass, alarm or distress anyone can be a criminal offence, therefore, reference to, and application of, the harassment policy does not deny or inhibit in any way whatsoever, either the organisation or the employee's legal rights, responsibilities, obligations and remedies. In serious cases dismissal and criminal prosecution can result.

The attached policy, procedure and guidelines are intended to eliminate bullying and harassment from the workplace by:

- Promoting a climate in which employees feel valued and sufficiently supported in bringing forward complaints without fear of victimisation or recrimination.
- Raising the awareness for all staff of the stance taken against all forms of bullying and harassment by the organisation and their own responsibilities for preventing such behaviour.
- Promoting awareness amongst staff of the reasonableness or otherwise of what may or may not be acceptable behaviour to colleagues and the standards of behaviour expected by the organisation and the impact which unacceptable behaviour can have on colleagues.
- Providing information regarding the adverse effects which bullying and harassment can have on staff and the organisation.
- Outlining the informal and formal procedures for dealing with bullying and harassment ensuring that the matter is dealt with promptly and sensitively and takes into account the rights of both parties involved.
- Providing access to confidential counselling, advice and support for victims of bullying and harassment at work.

- Providing a programme for the communication of the policy, monitoring its effectiveness and training for those involved in applying the policy.

Everyone has a responsibility for their own behaviour and to ensure that their actions, attitudes or behaviours do not cause distress or upset to colleagues. In addition, managers and supervisors have a specific responsibility to be vigilant in respect of the identification and elimination of bullying or harassment at work and to ensure implementation of, and adherence to, this policy.

This policy, procedure and guidelines are endorsed by the Board, senior management and the recognised trade unions, and will be communicated to all of those who require to be made aware of its contents.

POLICY AND PROCEDURE

1. IMPACT OF BULLYING/HARASSMENT

The health and morale of staff may suffer and levels of stress, anxiety and sickness may increase. It makes sense that a working environment which is free from bullying and harassment will enable staff to contribute more effectively and achieve higher levels of job satisfaction. It will also avoid the loss of staff with valuable skills and experience.

2. DEFINITIONS OF BULLYING/HARASSMENT

Bullying

As stated earlier, Homes for Life defines bullying as “persistent unwelcome behaviour, mostly using unwarranted or invalid criticism, nit-picking, fault-finding, also exclusion, isolation, being singled out and treated differently, being shouted at, humiliated, excessive monitoring, and much more”.

Bullying differs from harassment and discrimination in that the focus is rarely based on gender, race or disability. The focus is often on competence, or rather the alleged lack of competence of the bullied person. Whilst bullying is the common denominator of all harassment, discrimination, abuse, conflict and violence, bullying varies from harassment. The legal aspects are different, and the solution will differ according to the type of bullying.

Bullying is most commonly associated with an abuse of power most typically by a line manager or supervisor over subordinate staff. However, other power relationships may equally lead to bullying by colleagues or a group of people who may target one individual.

It must also be recognised that, albeit less common, managers may find themselves bullied by subordinate staff who use the threat of higher powers or formal procedures to make unreasonable demands.

Bullying is an inefficient way of working, resulting in disenchantment, demoralisation, demotivation, disaffection and alienation. Bullies run dysfunctional and inefficient organisations; staff turnover and sickness absence are high, whilst morale and productivity are low.

What is bullying?

People who are bullied find that they are: *(the following list is not intended to be exhaustive)*

- Constantly criticised and subjected to destructive criticism
- Subjected to nit-picking and trivial fault finding
- Undermined, especially in front of others, overruled, ignored, sidelined, marginalized, ostracised
- Isolated and excluded from what's happening
- Singled out and treated differently
- Belittled, degraded, demeaned, ridiculed, patronised, subjected to disparaging remarks
- Regularly the target of offensive language, personal remarks, or inappropriate bad language
- Threatened, shouted at and humiliated
- Set unrealistic goals and deadlines which are unachievable or which are changed without notice
- Have their responsibility increased but their authority removed
- Subjected to excessive monitoring or supervision
- Denied information or knowledge necessary for undertaking work and achieving objectives
- Either over-loaded with work, or have all their work taken away

Harassment

- Acts of harassment usually centre around unwanted, offensive and intrusive behaviour with a sexual, racial or physical component. It can take many forms, occur on a variety of grounds and may be directed at one person or a group of people. The intention of the perpetrator is irrelevant; it is the impact on the individual which determines whether harassment has taken place.

Again the following list is not intended to be exhaustive but to provide some examples of harassment or discriminatory behaviour:

Sexual Harassment

- Unwanted non-accidental physical contact ranging from unnecessary touching, patting, pinching or brushing against a colleague's body, to assault and coercing sexual relations;
- Unwelcome sexual advances, propositions or pressure for sexual activity: continued suggestions for social activity within or outside the workplace, after it has been made clear that such suggestions are unwelcome: offensive flirting;
- Suggestions that sexual favours may further a colleague's career or refusal may hinder it e.g. promotions, salary increases etc;
- The display of pornographic or sexually suggestive pictures, objects or written materials;
- Leering, whistling or making sexually suggestive comments or gestures, innuendoes or lewd comments;
- Conduct that denigrates or ridicules or is intimidatory or physically abusive of an employee because of his or her sex, such as derogatory or degrading abuse or insults which are gender-related and offensive comments about appearance or dress.

Racial Harassment

- Conduct that denigrates or ridicules a colleague because of his or her race, such as derogatory remarks, graffiti, jokes. Such conduct can be verbal or physical;
- The display or sending of offensive letters or publications: threatening behaviour;
- Being "frozen out" of conversations: jostling or assault, or other non accidental **physical contact**;
- Derogatory nicknames or racial name calling.

Disability Harassment

- Mimicking the effect of a disability or speech impairment;
- Ostracising, "freezing out", ignoring and staring;
- Making fun of a disability;
- Use of inappropriate terms (e.g. cripple, spastic);
- Inappropriate personal questions/comments about a disability;
- Belittling or patronising comments/nicknames;
- Moving a wheelchair without the user's agreement;
- Practical jokes (eg hiding a disability aid);
- Touching a visibly impaired person (to annoy).

Age Discrimination

- Ridiculing or demanding behaviour focused towards people because of their age.

Religious Discrimination

- Discriminatory behaviour which fails to acknowledge the rights or needs of people with different beliefs or practices.

Victimisation

- Where a person is treated less favourably than other people because, for example, that person has brought proceedings, given evidence, or complained about the behaviour of someone who has been harassing or discriminating against them.

Aids/HIV

- Harassment, ridicule or exclusion of people, due to their real or suspected infection with Aids/HIV.

3. FIRM, FAIR MANAGEMENT

Line managers are responsible for ensuring that staff who report to them perform to an acceptable standard within a performance management framework. Legitimate, justifiable, appropriately conducted monitoring of an employee's behaviour or job performance does not, therefore, constitute bullying.

It is reasonable to expect a manager to carry out these functions in a fair, firm and consistent manner. Carrying out these functions does not constitute an act of bullying or harassment, although some staff may feel stressed or anxious while the procedures are ongoing. However, abusing these procedures may constitute bullying or harassing behaviour.

It is important to differentiate between management and bullying or harassing behaviour. It is in the interests of the organisation that managers should be able to carry out their duties without threat of ill-intentioned, malicious or vexatious complaints.

Because of differences in perception, it is not always easy to differentiate between firm, fair management and bullying and harassment. It is accepted that these descriptions represent extremes of behaviour. In practice things will not be so clear and perpetrators may display characteristics which fall somewhere in the middle. Some suggestions are below:

<i>Firm/Fair Manager</i>	<i>Bullying/Harassing Manager</i>
Consistent and fair Leads by example Decisive Has a good appreciation of short, medium and long term needs, goals and strategy Learns from experience and applies knowledge gained from experience to improve business, communication and interpersonal skills Allows and trusts people to get on with the job Share information freely Only addresses genuine performance issues then focuses on performance and behaviour. Listens, guides, instructs Acknowledges failings	Aggressive, inconsistent and unfair Dominates, sets a poor example Random, impulsive Is rigidly short-term, often no more than 24 hours Cannot apply knowledge gained from experience except by being devious, manipulative and how to better evade accountability Constantly interfering, dictating and controlling Withholds information, releases selectively Makes false claims about alleged underperformance and focuses on the person, not behaviour or performance Tells Denies failings, always blames others

4. PROCEDURE

Where an individual believes that they have been bullied or harassed there are a number of options available to them dependent upon the circumstances of their own particular situation. Homes for Life suggest a two-tier procedure: an informal stage and then, if this is not sufficient or the offence is of a serious nature, a formal stage.

Informal Stage

This will involve the individual approaching the alleged bully or harasser in order to tell them that their behaviour is found to be offensive and why, and to ask them to stop using such behaviours. The individual may ask a colleague or a staff representative to be present for moral support. If the individual would find confronting the alleged bully or harasser too difficult but still wishes to pursue the matter informally they can ask either the trade union/professional organisation representative, line manager, or human resource adviser to speak to the person concerned. Another option may be for the individual to write directly to the alleged bully or harasser detailing the offensive behaviour and confirming the requirement to stop any further bullying or harassment.

The individual should keep a note on file which includes a statement that it should only be taken into account if formal or further informal procedures are initiated. This is necessary should evidence be required at a later date should the bullying or harassment continue or subsequently recur.

Unwitting and organisational bullying can often be defused at this stage without the need to escalate matters to the formal stage. A quiet word or a letter from the target will often be sufficient. It should be emphasised that in order to maintain working relationships, matters should be dealt with by an informal intervention wherever possible. This may involve facilitated discussion between the parties involved. However, this does not remove the inherent right of the individual to deal with the matter formally.

Where the informal approach is unsuccessful or the individual has chosen to go straight to the formal stage of the procedure the following arrangements will apply.

Formal Stage

A formal complaint should be made to the individual's line manager or supervisor, human resource adviser or to the line manager of the alleged bully or harasser. Any formal complaint should be made in writing detailing the basis upon which the alleged bullying or harassment has taken place.

The first step is to find out the facts, therefore an investigation is essential. The investigator will be impartial and confidentiality is guaranteed. It may be necessary for the organisation to consider based upon the circumstances of each case whether it may be more appropriate for an independent body to carry out the investigation. This should be discussed in partnership with the individual and their trade union/professional organisation representative if they have chosen to be represented.

All parties involved will be guaranteed a fair and impartial hearing.

As formal disciplinary action is a possible outcome from this investigation it should be conducted in accordance with the provisions of the disciplinary procedures. It is also crucial that the same timescales within these procedures are adhered to. Whereas it may not be practicable to determine within this procedure timescales to suit every situation the individual, their representative and the alleged bully/harasser must be advised in writing prior to the commencement of the investigation the envisaged timescale. Any significant changes to the timescale must also be advised in writing with the reasons for these changes. Any suspensions/relocations arising from this investigation will be carried out taking account of all of the circumstances.

At all stages of the process the individual and the alleged bully or harasser will have the opportunity to be accompanied by a colleague or trade union/professional organisation representative and it is crucial that at all stages confidentiality is assured. Those involved in carrying out the investigation must recognise the difficulty which some individuals will have in talking about the incidents involved to a third party and that they may become distressed during

the process. They may harbour feelings of embarrassment, a fear of being disbelieved or not being taken seriously, a fear of further damaging the working environment or a fear of management being biased against them. Talking and being questioned about the incident(s) therefore often serves to add considerably to the stress already suffered as a result of the bullying or harassment itself.

It is important that an individual is not questioned in a way which implies that they have either consciously or unconsciously invited the bullying or harassment. That in its own way can be a form of bullying or harassment which will add to the stress being experienced by the individual. Also remarks implying that the bullying or harassing behaviour was meant as a joke, or that someone was only being too friendly, or questioning someone's taste in clothes (in the case of sexual harassment) are also unacceptable. This does not debar an organisation from having a code regarding acceptable standards of dress, however, this should be taken up as a separate management issue and should not be raised for the first time following a complaint of harassment.

It should not be necessary for the individual or the alleged bully or harasser to have to repeat their statements to different managers at different times thereby increasing the stress they may suffer. Full, written and signed statements from all involved should be taken at an early stage. A written and dated record of all investigatory interviews should be made.

Formal Hearing

Any formal disciplinary hearing should be conducted in accordance with the natural justice provisions contained within the disciplinary procedure.

Homes for Life will determine the composition of the panel in line with its existing policies.

It will be for the chair of the panel to determine how the hearing will be structured, following consultation with those involved, taking into account the sensitivity of the issues involved and the need to protect the rights of all involved.

Decision

There are four potential outcomes following an investigation. These are:

- The complaint is not founded;
- There is insufficient evidence;
- Evidence and/or nature of complaint justifies counselling/advice only;
- Evidence justifies formal disciplinary action.

Formal Action

If following an investigation and formal disciplinary hearing a complaint is held to be valid, appropriate formal action will be taken, which in serious cases may include dismissal. In serious circumstances if relocation proves necessary, every effort will be made to relocate the bully or harasser and not the complainant unless it is the stated wish of the individual that they wish to be moved. The organisation will in all cases where bullying or harassment is founded seek to prevent a recurrence of this behaviour.

Both the individual and alleged bully or harasser will be notified of the outcome in writing with due regard for confidentiality of both parties.

No Formal Action

If following an investigation and/or a formal disciplinary hearing no formal action is taken, the individual and alleged bully or harasser will be notified of the outcome in writing with due regard for the confidentiality of both parties. If a claim is found to be malicious in nature then the individual may find themselves subject to formal disciplinary action.

It may be the case that whilst no formal action is taken some informal action may be appropriate such as counselling of the alleged bully/harasser or facilitated discussion to attempt to resolve the situation. In this situation both the individual and alleged bully or harasser will be notified of the outcome in writing with due regard for the confidentiality of both parties.

Formal Review

If a decision to take no further action is made an employee or their representative may request a formal review. This request should be made to the next senior management level or other individual as agreed within Homes for Life. A request for a formal review should be made within 2 weeks of any decision. It will be for this individual to decide once they have reviewed the investigative material as to whether further interviews or hearings are required. These should be completed as timeously as possible.

It is recommended that further interviews or hearings are kept to a minimum to protect those involved.

Monitoring and Review of Policy

Responsibility for monitoring the application of this policy will rest with the Administrator.

This policy will be reviewed at regular intervals with amendments being made as appropriate following consideration by staff, staff representatives, management and Directors.

Bullying and Harassment by Members of the Public and Directors

Staff have the same rights as service users/stakeholders to be treated with respect and dignity at all times and have the right to complain if bullied or harassed by members of the public, Directors or Contractors or staff from other agencies.

If a member of staff is bullied or harassed in the course of carrying out their duties the following procedure should be adopted. It is inappropriate to swap the employee with another employee without explaining to the individual the reasons for this action. It is a priority of Homes for Life to ensure that no staff are put in a situation of potential risk and the following procedures are put in place to protect staff whilst carrying out their duties.

Informal Stage

Where possible incidents should be dealt with informally in the first instance.

If the employee feels able to do so they should inform the bully or harasser, at the time if possible, that they find their actions/remarks and behaviour to be unacceptable. They should state that they wish the unwanted behaviours to stop. If the situation warrants the need for a witness staff are advised to approach a colleague to accompany them when approaching the alleged bully or harasser. The employee should then report the matter to their manager as soon as possible.

If the employee does not feel able to speak to the bully or harasser personally they can ask their manager to do this on their behalf.

It will be the responsibility of the manager involved to discuss the action taken to date and what should be done in the future if any further incidents occur.

If the harasser is a Director, it may be appropriate to discuss the matter with the Director at the earliest opportunity.

If the bully or harasser is a member of the public it may be appropriate to discuss the matter with the Director.

The manager must inform the harasser of the consequences of further incidents. Where it appears the individual is refusing services on personal/racial grounds they should be advised that their action may be discriminatory. It should also be made clear to the individual that in taking this action they may be deemed to be refusing services altogether which could result in either the withdrawal of a service or the loss of access to organisation premises.

A file note should be kept of the details of the incident, the action taken and by whom.

If informal action proves insufficient to deal with persistent acts of bullying and harassment then management reserves the right to take further formal action. (In serious cases it may be appropriate to move directly to this stage)

Formal Action

The manager must consider the following prior to taking any action and making their decision:

- The degree to which the incident undermines the relationship between parties;
- If any previous incidents have occurred and the severity of these;
- The effects of the incident on the employee.

If the incident is serious, or a repetition of a previous incident(s) for which informal action has been taken then the bully or harasser should be written to officially by the relevant senior manager informing them:

- That their comments, actions, behaviour is not acceptable and is potentially discriminatory;
- That further incidents will not be tolerated.
- Further incidents may result in the withdrawal of services.

Where the incident is sufficiently serious the senior manager will meet with the individual prior to putting the matter in writing as above. Any letters should be copied to the appropriate senior management.

In cases of physical violence or serious threats of violence the senior manager should also involve the police as appropriate. Notwithstanding this a member of staff may at any time involve the police as they wish.

Formal Review

If a decision to take no further action is made an employee or their representative may request a formal review. This request should be made to the next senior management level or other individual as agreed within Homes for Life. A request for a formal review should be made within 2 weeks of any decision. It will be for this individual to decide once they have reviewed the investigative material as to whether further interviews or hearings are required. These should be completed as timeously as possible.

It is recommended that further interviews or hearings are kept to a minimum to protect those involved.

Bullying / Harassment by Contractors and Staff from Other Agencies

In cases where the bullying or harassment involves contractors or staff from other agencies the stages as detailed above should be applied. However, due to the specific nature of the relationship between the organisation and these individuals/organisations, the following additional step should be included in the informal stage.

If the harasser is a contractor or staff member from another agency the manager will contact the appropriate senior person within the company/organisation concerned to advise them that this type of behaviour is unacceptable and that if it is repeated then the individual concerned

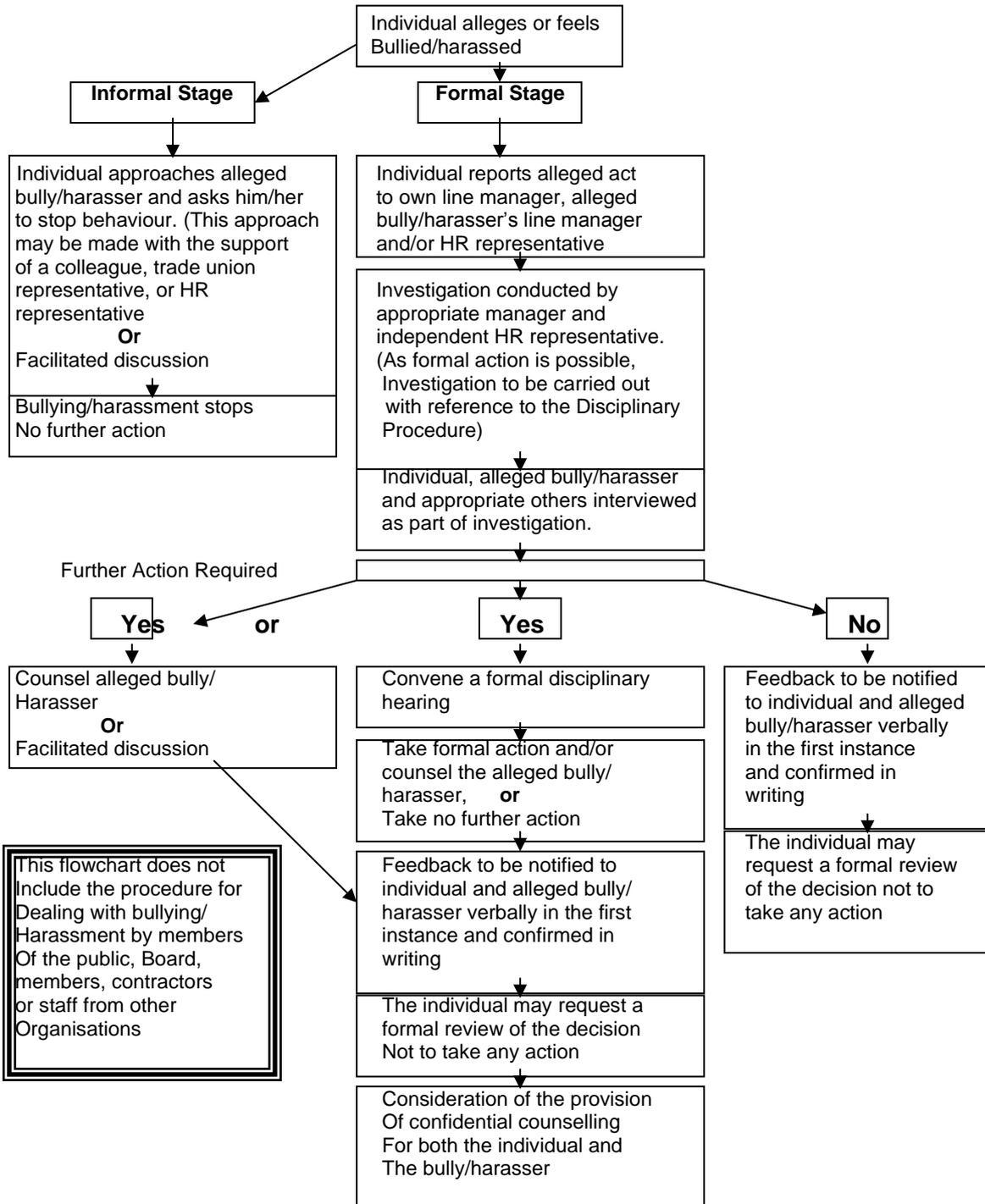
may be refused entry to organisation premises. (This is on the basis that all contractors are advised that the provisions of the Policy apply to them in advance of an award the contract for services under which they are operating. Also those partnership organisations are aware that whilst on organisation premises or dealing with staff employed by the organisation, they will be expected to behave in an acceptable manner).

Should the matter not be resolved informally the formal stage would require the appropriate senior manager to write to the appropriate senior person within the company/organisation concerned to advise them that this type of behaviour is unacceptable and that if it is repeated then the individual concerned may be refused entry to organisation premises or continued contact with staff of the organisation.

Formal Review

The same procedure as above.

Bullying and Harassment Procedure



Appendix 2 - Policy Checklist
CORE STRATEGY ELEMENTS

Acceptance that harassment/bullying is an organisational issue.	
Measures to assess and prevent harassment and bullying.	
Information and training about the harassment/bullying policy.	
Development of organisational specific "Code of Conduct".	
Access to confidential support (confidential contact).	
Access to professional counselling services.	
Provision for review and monitoring of the policy/procedure.	
Legal framework communicated.	
Access to facilitated discussion.	

KEY POLICY AND PROCEDURE ELEMENTS

Includes commitment from senior management.	
Statement that harassment/bullying is unacceptable and will not be tolerated.	
Clear definitions of unacceptable behaviour.	
Statement that harassment/bullying will be treated as a disciplinary offence.	
Responsibilities of employees and managers.	
Confidentiality provisions within the process.	
Clear procedure separate from the normal grievance procedure.	
Informal stage.	
Jointly developed and agreed with staff/staff representatives.	
Applicable to all staff.	
Incorporates harassment by members of the public, Directors, contractors and staff from other agencies.	