



Dignity at Work Policy

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1. Purpose

- 1.1 Genome Research Limited (GRL), is committed to creating a work environment where everyone is treated with dignity and respect and which is free from bullying and harassment. This policy applies to all GRL employees (Sanger Institute, Wellcome Genome Campus and Connecting Science).
- 1.2 GRL will not tolerate bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and if appropriate, disciplinary action will be taken. GRL will also not tolerate victimisation of a person for making allegations of bullying or harassment in good faith or of a person who supports another to make such a complaint. Victimisation is a disciplinary offence (see Section 3.6).

2. Policy Overview

- 2.1 This policy covers bullying and harassment of and by managers, employees, students and visiting workers and, where appropriate, contractors, agency staff and anyone else engaged to work at GRL, whether by direct contract or otherwise.
- 2.2 The policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace e.g. business trips and work-related social events.

3. Definitions

- 3.1 **Bullying** is offensive, intimidating, malicious or insulting behaviour, and can be an abuse, or misuse of power through means that undermine, humiliate, denigrate or injure (emotionally or physically) the recipient.
- 3.2 **Harassment** is defined in the Equality Act 2010 as unwanted conduct related to a relevant protected characteristic (i.e. age, disability, gender reassignment, race, religion or belief, sex or sexual orientation), that has the purpose or effect of violating another's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

For the purposes of this policy, GRL considers harassment to be such conduct related to any personal characteristic (real or perceived), where it cannot be reasonably justified in the context of working life and all the relevant circumstances. Harassment may be persistent or an isolated incident if sufficiently serious.

A complaint may be made about behaviour an individual finds offensive, even if it is not directed at them.

This policy also covers situations where an employee is harassed by someone who does not work for the organisation (such as a supplier or contractor).

- 3.3 **Sexual Harassment.** Under the Equality Act harassment can also be unwanted conduct of a sexual nature that has the effects described above. Sexual harassment may also occur if a person is treated less favourably than others because of their rejection or submission to conduct of a sexual nature.

In deciding whether conduct has the effects referred to above, and is agreed to be bullying and/or harassment, the Institute will take the following into account:

- The perception of the recipient; and
- The other circumstances of the case; and
- Whether it is reasonable for the conduct to have that effect.

3.4 Examples of bullying or harassment

Listed below are some examples of behaviour that might constitute bullying or harassment in the eyes of the recipient. This list is by no means exhaustive but includes:

- unwanted/upsetting physical contact ranging from touching to serious assault;
- unwanted/upsetting verbal or written contact such as jokes, offensive language, gossip and slander, insults, suggestive remarks or lewd comments;
- aggressive and intimidating behaviour such as shouting, refusing to let others speak, coercion;
- making threats or comments about job security without foundation;
- engaging people in unwanted conversations about their sex life, or the sex lives (real or otherwise) of others;
- visual display of posters, suggestive pictures or objects, obscene gestures, graffiti, screensavers or websites;
- spreading malicious rumours, or sharing personal information about someone to others who do not need to know;
- ridiculing or demeaning someone;
- exclusion, isolation or non-cooperation at work or in work-related social activities;
- unfair treatment, e.g. isolating one or a group of people for treatment less favourable than others, when this cannot be objectively justified;
- overbearing supervision or other misuse of power, e.g. intimidation, repression, exclusion;
- unreasonable refusal to co-operate with a colleague or manager's requests;
- deliberately undermining a person either in their presence or absence, to others;
- making malicious complaints about others that are untrue.

Bullying and harassment can happen in a number of ways (such as email, phone, face to face) in any hierarchical direction and can happen to one or more people at the same time.

3.5 **Victimisation** is treating someone less favourably than others because they have in good faith, made a complaint (formal or informal) of bullying, harassment or discrimination of themselves or another person, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because he or she has made a complaint. Everyone has the right to make a complaint (or support someone else in these circumstances) if they feel they have been the subject of bullying or harassment without fear of this leading to victimisation.

Victimisation is not tolerated. GRL will take appropriate action to deal with any alleged victimisation, which may include disciplinary action.

- 3.6 All bullying and harassment is misconduct and is a disciplinary offence which will be dealt with under the disciplinary policy. This may result in a disciplinary sanction up to and including summary dismissal for gross misconduct in serious cases. Where appropriate other remedial actions will be considered such as a demotion or transfer.
- 3.7 Serious bullying or harassment may amount to other civil or criminal offences, e.g. civil or criminal offences under the Protection from Harassment Act 1996 and criminal offences of assault.
- 3.8 Making a complaint which you know to be untrue, or giving evidence which you know to be untrue, may lead to disciplinary action being taken against you.

- 3.9 Managing Performance and Conduct issues: The reasonable and appropriate management of individual performance problems in accordance with GRL's policies and procedures will not constitute bullying or harassment.

4. Informal Approach - Raising a complaint about Bullying, Harassment or Victimisation

- 4.1 GRL is committed to seeking informal resolution where this could be effective, e.g. in less serious cases and particularly where the case is found to be one of misunderstanding rather than misconduct, as this is more likely to enable working relationships to mend to the benefit of all parties.
- 4.2 You are encouraged to first attempt to resolve matters informally where possible. The person may not know that their behaviour is unwelcome or upsetting. An informal discussion may help them to understand the effects of their behaviour and agree to change it.
- 4.3 Dealing with matters informally can speed up the process of resolution and enable both parties to return to a comfortable working relationship more quickly, with hurt feelings kept to a minimum and as few as possible other people involved.
- 4.4 You may feel able to approach the person yourself, or with the help of someone in the HR Team, a manager, Employee Partner or a colleague. Alternatively, an initial approach could be made on your behalf by one of these people. You should tell the person, in a clear, but respectful way, what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately. You may find in the conversation that an explanation is offered of the behaviour that makes you view it differently. Try to stay open-minded and be willing to listen to the explanations offered as you would expect to be listened to also. Some cases of perceived bullying or harassment are centered around misunderstanding, or amplification of small issues that have unwittingly caused resentment over time. Open, honest and respectful conversation can often help to identify root causes, clear the air and find an agreed way forward.
- 4.5 Depending on the circumstances, you may want to add that, if the behaviour continues, you intend to make a formal complaint. You should keep a note of the date and what was said, done and agreed. This will be useful evidence if the unacceptable behaviour continues and you wish to make a formal complaint.
- 4.6 Mediation is often a useful intervention in helping to resolve disputes and often avoids stressful situations which can occur when instigating formal procedures. Mediation can often help parties to rebuild relationships and work together to find practical solutions. You can find out more about mediation from the Human Resources Team.

5. Formal Approach - Raising a complaint about Bullying, Harassment or Victimisation

- 5.1 If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint under the [Grievance Policy](#).
- 5.2 It may be useful to keep a diary of incidents, logging dates and times and any witnesses.
- 5.3 All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a work colleague or [Employee Partnership representative](#) of your choice at any formal meeting dealing with your grievance. You will be kept informed of the general progress of the investigation and the outcome of any disciplinary proceedings. GRL will decide, on the balance of probabilities, after considering all available evidence, whether harassment or bullying has occurred and identify an appropriate course of action.
- 5.4 GRL will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis. For example, your identity and the nature of the allegations must be revealed

to the person you are complaining about, so they are able to understand and respond to the allegations. Some details may also have to be given to potential witnesses but the importance of confidentiality will be emphasised to them.

- 5.5 Less serious cases of alleged bullying or harassment within the organisation may be dealt with through the mediation procedure if all parties agree to this, with a view to informal resolution. However, the appropriateness of this course of action will be advised upon by your HR Partner and if it is felt that mediation is inappropriate, (e.g. if the allegations are of a severe nature) the formal process may be instigated. Where mediation is used, other formal proceedings, e.g. grievance or disciplinary proceedings, may be suspended, but can be returned to if mediation does not successfully resolve matters.

6. Responsibilities for Preventing and Tackling Bullying and Harassment

- 6.1 We all have a responsibility to help create and maintain a work environment free from bullying and harassment. You can help to do this by:

- being aware of how your own behaviour may affect others and changing it if necessary - you can still cause offence even if you are "only joking";
- treating your colleagues with dignity and respect;
- taking a stand if you think inappropriate jokes or comments are being made;
- making it clear to others when you find their behaviour unacceptable, unless it should be obvious in advance that this would be the case;
- intervening, if possible, to stop harassment or bullying and giving support to recipients;
- making it clear that you find bullying and harassment unacceptable;
- reporting harassment or bullying to your manager or Human Resources and supporting in the investigation of complaints; and
- if a complaint of harassment or bullying is made, not prejudging or victimising the complainant or alleged harasser.

- 6.2 Managers have a particular responsibility to:

- set a good example by their own behaviour – and ask for help if they have concerns;
- allow people to raise complaints without fear of victimisation from them;
- ensure that there is a supportive working environment;
- make sure that staff know what standards of behaviour are expected of them;
- intervene to stop bullying, harassment, victimisation or behaviour that could reasonably be seen in this way by others; and
- report promptly to Human Resources any complaint of bullying, harassment or victimisation or any incident of such witnessed by them.