

TRAFFIC



**BULLYING & HARASSMENT
POLICY**

VERSION 1 - AUGUST 2024

VERSION CONTROL

Title	Bullying & Harassment Policy
Developed By	Global Human Resources
Date Approved	August 2024
Subject	Bullying and Harassment
Applicable to	All TRAFFIC staff worldwide, Board trustees, volunteers, exceptional consultants and seconded individuals.
Related Documents	Conditions of Service, Code of Conduct, Global Human Resources Manual and Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment Policy.
Distribution	Available on TRAFFIC's Intranet under Key policies

DOCUMENT HISTORY

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1. SCOPE

This policy is applicable to all staff employed directly or on behalf of TRAFFIC, irrespective of location, length of service or position within the organisation. It includes any individual that serves as a board trustee of a TRAFFIC entity, any volunteers or exceptional consultant working for TRAFFIC and any seconded staff to TRAFFIC. All individuals will be collectively referred to as "TRAFFIC staff" for the purpose of this policy.

This Policy complements the general principles established in the Code of Conduct and clarifies the expected standards of conduct and professional ethics, including the respect for other people's dignity and integrity. In particular, it sets clear obligations for TRAFFIC Staff, volunteers and consultants to prevent and respond to bullying and harassment and to refrain from condoning, encouraging, participating in, or engaging in bullying and harassment. This may go beyond the physical premises and normal business hours of TRAFFIC, such as conduct at meetings, events, workshops, training, or on social media.

This Policy documents the approach and steps TRAFFIC will take to provide a safe environment free from bullying and harassment. TRAFFIC recognises the need to challenge any tacit or explicit acceptance of bullying and harassment to prevent escalation. TRAFFIC also undertakes to improve the understanding of bullying and harassment across TRAFFIC's community to prevent it from occurring, as well as providing a supportive culture, which encourages reporting of incidents and ensures that they are dealt with sensitively and appropriately. It is recognised that it can be distressing for all those affected by a bullying and harassment disclosure; this Policy aims to ensure that all parties are treated with dignity and respect and provided with appropriate support.

2. BACKGROUND

TRAFFIC International is a global, multicultural and multilingual organization that strives to ensure best practice in its everyday operations. By agreeing to work for TRAFFIC, staff members undertake to uphold the highest standards of professional behaviour and to ensure that TRAFFIC's integrity and reputation shall at all times be safeguarded by their actions. Therefore, the highest standards of conduct and professional ethics are expected from its Staff in their conduct when performing their work for TRAFFIC.

TRAFFIC is committed to providing a safe environment for its community, free from discrimination on any ground and from harassment at work.

TRAFFIC has zero tolerance for bullying and harassment in all its activities.

All TRAFFIC employees are expected to comply with this Policy and failure to do so will be treated as a disciplinary matter which may result in the imposition of a disciplinary sanction, up to and including dismissal.

3. DEFINITION

Bullying:

Workplace bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual's right to dignity at work. An isolated incident of the behaviour described in this definition may be an affront to dignity at work but as a one off incident is not

considered to be bullying.

Harassment:

Harassment may consist of any act or conduct, whether verbal, physical or visual, which is offensive, humiliating or intimidating on the grounds of marital status, family status, sexual orientation, religion, age, disability, race, colour, nationality, ethnic or national origin, including acts of physical intimacy, spoken word, gestures or the production or display or circulation of written material or pictures. Harassment is behaviour which could reasonably be regarded by an ordinary person as offensive and which is also unwelcome, unreciprocated and offensive to the recipient resulting in them feeling threatened or compromised.

The behaviour itself and the impact on the recipient determines what constitutes harassment, not the intention of the offender. Harassment may be conducted by one or more persons against another or others, which could reasonably be regarded as undermining the individuals right to dignity at work. Even isolated incident of the behaviour described in this definition may be an affront to dignity at work.

Harassment can occur both inside the workplace and outside, for example at training venues or social functions. Many forms of behaviour can constitute harassment which may include but not limited to repeated incidences of:

- Unwanted physical contact ranging from touching, jostling, shoving to serious assault.
- Jokes, comments, offensive language, malicious gossip and songs.
- Making fun of a disability.
- Offensive letters/memos/e-mails.
- Offensive gestures, flags, bunting, emblems.
- Offensive publications, graffiti, posters.
- Isolation or non-co-operation or exclusion from social activities.
- Intrusion by pestering, spying or stalking.
- Aggressive, overbearing behaviour.
- Pressure to behave in a manner, which the complaining employee thinks, is inappropriate.

Harassment includes bullying which involves an abuse or misuse of power by one employee over another, often, but not necessarily, by someone in authority. It should not, however, be confused with ordinary management. It can be perpetrated by customers, clients or business contacts.

For definitions and information on Sexual Harassment, please see the related policy on Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment.

4. AWARENESS AND OBLIGATIONS

Every staff member has the right to work without fear of harassment and has the responsibility to protect that right. Managers and supervisors have a particular responsibility for ensuring that this Policy is implemented and communicated to all staff.

Any manager or supervisor who becomes aware of behaviour which breaches this Policy, whether or not a complaint has been made, has a responsibility to investigate the matter and resolve it as quickly as possible and report to the Global Human Resources. Apart from the impact on the individual targeted, harassment detracts from a productive and supportive working environment and, therefore, has a direct impact on organisational effectiveness. All allegations of harassment will, therefore, be dealt with seriously, promptly and in confidence.

Managers have a particular responsibility to:

- set a good example by their own behaviour, treating all in the work place with courtesy and respect;
- 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 or harassment;
- be vigilant for signs of harassment and take action before a problem escalates;
- report promptly to human resources any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.
- respond sensitively to an employee who makes a complaint of harassment.

Each staff member can contribute to achieving a work environment, which is free from harassment by:

- being aware of the organisation policies and taking the compulsory training on Bullying & Harassment to ensure you have a good understanding and awareness of the issues
- 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;
- intervening, if possible, to stop harassment or bullying and giving support to recipients;
- reporting harassment or bullying to your manager or human resources and supporting the organisation in the investigation of complaints; and
- if a complaint of harassment or bullying is made, not prejudging or victimising the complainant or alleged harasser.

5. REPORTING AND INVESTIGATIONS

The aim of this procedure is to stop undesirable behaviour and prevent recurrence. When appropriate, every effort will be made to resolve the situation informally, but it is important that incidences of Bullying and/or Harassment are reported, so that they can be addressed to make it a respectful working environment for everyone.

(i) Informal Steps

All employees have the right to a working environment free from unfair discrimination, harassment or victimisation of any kind. It is important that anyone experiencing any of these types of behaviour does not ignore the problem. Confidential advice is available from the HR team.

An employee who feels that they or others have been harassed, victimised, bullied or otherwise treated in a way that breaches this Policy should, if they feel able, tell the individual concerned that the behaviour is considered to be offensive and that it must stop.

This is often enough to resolve the problem, particularly if the individual was unaware that the behaviour was causing offence.

If you are not comfortable talking directly to the individual, you should inform your line manager or HR informally, who can provide some advice and feedback to the individual about their behaviour as an informal conversation. This is recommended if this is the first incident, although the level of anonymity will depend on the circumstances.

If, however, the situation persists, notwithstanding such informal attempts at resolving the problem, then it should be raised formally in accordance with the procedure below.

(ii) Formal Steps

It is not necessary to have told the harasser to stop or to have gone through the informal steps before making a formal complaint. Formal complaints should be raised as soon as possible so that the matter can be dealt with quickly. While it is preferable that a formal complaint should be made in writing, this will not preclude the investigation of a complaint, which has been made verbally.

You can formally report your complaint to your line manager, your HR representative, HR Director or a member of SLT, depending on who you feel is appropriate or you are most comfortable with.

Additional contact details within TRAFFIC are:

Email: accountability@traffic.org

Global HR: +44 (0)1223 331931 (voice mail)

Once reported, a confidential interview will be arranged to establish the full details. This will be followed by a prompt and thorough investigation, which will be carried out by an impartial member of the HR team or a Senior Director.

In an investigation situation, TRAFFIC will:

- respect the right of both parties to be accompanied or represented by a work colleague, in separate meetings
- respect the right of the accused party to know what they are accused of and who has made that accusation (where appropriate). The alleged perpetrator should be notified in writing that an allegation has been made and afforded an opportunity to respond to the allegation. In cases of Sexual Harassment, a higher level of anonymity may be needed depending on the situation.
- commit itself to a realistic time scale for resolution of the problem.
- ensure confidentiality as far as possible for everyone involved.
- ensure a fair and impartial hearing for those involved.

The complainant and the perpetrator will be informed in writing of the findings of the investigation.

If the investigation reveals that the complaint is well founded, disciplinary action may be required. Disciplinary action against the person alleged to have committed the behaviour complained about may include dismissal, depending on the seriousness of the misconduct. A person against whom a complaint of harassment or sexual harassment has been made may be suspended with pay pending the outcome of the investigation.

If the investigation reveals that the complaint is malicious or without foundation, disciplinary action may be taken against the complainant up to and including dismissal.

If either party feels that management's handling of the matter has been inappropriate, they may raise this through TRAFFIC's grievance procedure.

(iii) Reporting Harassment from Clients, Customers or Business Contacts

If an employee believes that they have been subjected to harassment by a client, customer or any other business contact, they should report the matter as soon as possible to their line manager and or HR. It is very important to report the dates and times of the alleged harassment and the identity of the client, customer or business contact.

The complaint will be investigated by the relevant manager or HR. If the complaint is well founded, TRAFFIC will take such steps as are necessary and possible to prevent the re-occurrence of the harassment.

6. IMPLEMENTATION, MONITORING AND REVIEW

TRAFFIC is responsible for the effective implementation, monitoring, and reporting obligations under this Policy. Global Human Resources will develop/update guidelines and procedures, to operationalise and implement this Policy and ensure training is available for all staff. Senior Leaders are responsible to take the necessary measures to communicate clearly the expectations of TRAFFIC and the intolerance of SEAH.

Global Human Resources will continue to develop supporting procedures and controls and provide training for TRAFFIC staff to mitigate opportunities for SEAH in TRAFFIC. A case registry of reports filed regarding SEAH will also be maintained and closely monitored to ensure procedures are followed and identify any points that can be learnt and changes applied.

As part of TRAFFIC's commitment, compulsory e-learning will be provided to all new employees and refreshers requested for all staff every 2 years on Bullying and Harassment.

It is the responsibility of all TRAFFIC staff to ensure compliance with the above Policy.

This Policy will be reviewed at least every 3 years in line with TRAFFIC's Policy Register commitment.