

Introduction

We value all people associated with The Leprosy Mission (TLM) and uphold our legal and moral responsibilities to treat everyone with fairness, respect, and dignity. TLM is committed to providing a working environment free from bullying and harassment, where individuals can feel safe and can work competently and confidently, and where they are able to raise concerns and know those concerns will be taken seriously and acted upon.

All TLM staff and representatives are required to treat each other, along with beneficiaries, partners, and visitors, with dignity and respect. TLM has a “zero tolerance” policy to Bullying and Harassment, including sexual harassment and victimisation.

Scope

This policy applies to:

- “**TLM Staff**” includes all TLM paid employees, working part-time or full-time.
- “**TLM Representatives**” includes for example: TLM volunteers, interns, Board members, advisors, consultants.
- **Official visitors to TLM projects** (national and international).
- Bullying or harassment (including sexual harassment) which occurs inside or outside of the workplace (such as on business trips, during fieldwork or at work-related events or social functions).
- The behaviour of staff or representatives inside **OR** outside working hours which may impact upon work or working relationships.
- TLM recognises that Staff or Representatives, in the course of their work with TLM, may have a bullying and harassment concern that involves persons linked to other organisations. For example, they may have a bullying and harassment concern relating to a working relationship with one of our Partners or other third party. Under this policy, a concern of this nature is treated in the same way as other bullying and harassment concerns within TLM, with appropriate action taken as far as is possible, and involving the Partner or other third party.

Responsibilities

- The Global Fellowship Board has responsibility for ensuring that a global policy is in place that promotes a zero-tolerance culture towards bullying and harassment within TLM.
- The Global Fellowship Trustee Safeguarding Lead, with support from the global Designated Safeguarding Officer (DSO) will monitor this global policy.
- The Local Country Board is responsible for the effective operation of this policy at the local level.
- The Country Leader is responsible for the implementation of this policy and must ensure that all managers and other relevant staff (e.g., Designated Safeguarding Leads and HR personnel) who may deal with concerns or investigations under this policy receive regular and appropriate training. This training may include, for example, enhanced induction, annual refresher training and specific training for investigators.
- All managers have a specific responsibility to operate within the boundaries of this policy, ensure that all staff understand the standards of behaviour expected of them and to act when behaviour falls below its requirements.

- All TLM staff and representatives have a personal responsibility NOT to harass or bully other colleagues.
- All TLM staff and representatives should disclose any instances of harassment or bullying of which they become aware in accordance with this policy.

Questions about this policy and requests for training or information on dealing with bullying or harassment should be directed to the relevant Country Leader, HR personnel or Designated Safeguarding Lead.

Adoption and Implementation of this Policy

- This policy sets the minimum standards expected across the Global Fellowship. It is understood that each country is different, and they may contextualise and/or expand on its requirements in their country context in a manner that is consistent with these Global standards. In the event of discrepancy between country and global standards, the higher standard will apply.
- This policy is underpinned by TLM's Global Safeguarding standards including the [Safeguarding children and vulnerable adults' policy](#); the [Safeguarding children and vulnerable adults' procedures](#); the [Safeguarding Code of Conduct](#); and the [Whistleblowing policy](#).

Statements of commitment

- TLM will take all allegations of bullying and harassment seriously and investigate them promptly, efficiently, sensitively, and confidentially, without bias and giving everyone a fair hearing.
- TLM will respond to **ALL** bullying and harassment concerns raised as soon as practically possible and without unreasonable delay.
- TLM staff or representatives who raise concerns, or who participate in good faith in any investigation relating to bullying and harassment, will not be penalised, disadvantaged, or suffer victimisation or detriment, as a result. They will also not be penalised or disadvantaged for giving responsible support to a colleague who says they have suffered or witnessed any such treatment.
- Staff handbooks and induction processes should clearly communicate this policy (this includes translating it into the local working language(s) if necessary).
- All TLM staff and representatives will be asked to read this policy along with the Code of Conduct and other TLM Safeguarding policies and procedures and be given the opportunity to ask questions.

Definitions

Bullying is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment that undermines the confidence and self-esteem of the recipient(s). Such behaviour may be offensive, intimidating, malicious or insulting. It could be an abuse or misuse of power that humiliates, injures, upsets, undermines, or threatens the recipient(s). 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.

Bullying may be physical, verbal, or non-verbal. It can include conduct that is not face-to-face, such as via text message, email, and social media.

Some examples of behaviour that may constitute bullying are:

- Continually making jokes or remarks about a person or making more remarks about one member of a team compared to other team members.
- Verbal abuse (including displays of aggression), swearing or name calling.
- Excluding or isolating employees (whether deliberate or not)
- Deliberately changing work rosters to inconvenience individuals.
- Deliberately withholding information or resources that is vital for effective work performance.

Bullying is not:

- Occasional differences of opinion or non-aggressive conflicts.
- Constructive feedback, appropriately managing under-performance and other disciplinary action undertaken in accordance with TLM policies and processes.

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

Harassment means any unwelcome verbal, non-verbal or physical conduct, that is related to a person's characteristics, whether they are actual or perceived, which include: age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Such conduct has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Harassment may be seen to have occurred if the behaviour makes the victim feel any of the following: offended, humiliated, uncomfortable, intimidated and / or frightened at work. A person may be harassed even if they were not the intended "target".

Examples of harassment include, but are not limited to:

- Harassment related to a particular characteristic e.g., age, disability, sex, race, sexual orientation, religion.
- Unwanted physical behaviour towards a person or their property, including touching, pushing, and grabbing.
- Offensive e-mails, text messages or social media content or the display of offensive materials.
- Unwanted jokes, banter, mocking or belittling a person.
- Acts of aggression.

Sexual harassment means any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might cause offence or humiliation to another. Sexual harassment is particularly serious when it interferes with work, is a condition of employment, or creates an intimidating, hostile or offensive environment. Sexual harassment may occur within the workplace/working hours or outside the workplace/working hours. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between or amongst persons of the opposite or same sex.

Examples of sexual harassment include:

- Unwelcome demands or pressures for sexual favours
- Unwelcome touching (e.g., patting, pinching, hugging) or unnecessary familiarity.

- Leering, rude, or sexual gestures, jokes or innuendo.
- Inappropriate comments on physical appearance, dress, or private life.
- Comments or rumours about a person's sex life or relationships.
- Sexual advances accompanied by:
 - an implied or overt promise of preferential treatment in employment.
 - an implied or overt threat of detrimental treatment in employment.
 - an implied or overt threat about the present or future employment status the employee holds.
- The public display of inappropriate material (including pornography), ranging from what might be considered mildly erotic through to material that is sexually explicit (e.g., emails, posters, pictures, graffiti, screen savers or text messages).

In summary, bullying and harassment (including sexual harassment) are any behaviour that is unwanted by the person to whom it is directed. It is the impact of the behaviour rather than the intent of the perpetrator that determines whether bullying or harassment has occurred.

Bullying and harassment (including sexual harassment) can occur in many forms, including (but not limited to): in person, by letter, by email, by phone, online, by social media etc. A single incident can amount to bullying or harassment, as well as continual or sustained incidents or behaviours over a period of time.

Raising & resolving a bullying and harassment concern

It may be possible to resolve a bullying and harassment concern **informally**. Sometimes people are not aware that their behaviour is unwelcome, and an informal discussion can lead to greater understanding and an agreement that the behaviour will cease. It may be that you feel able to do this yourself, or you may wish to seek support from Line Manager or HR personnel.

If informal steps are not felt to be safe, or appropriate, or are not found to have solved the concern, the issue should be **formally** raised with Line Manager or HR personnel.

Some Bullying and Harassment concerns are **HR matters** that will be resolved through the TLM Member's internal Grievance and Disciplinary procedures. Serious cases of bullying or harassment may amount to gross misconduct resulting in dismissal. In addition, making deliberate false allegations, or retaliating against someone, may be treated as misconduct and dealt with under the TLM Member's internal Grievance and Disciplinary procedures.

Some Bullying and Harassment concerns are **Safeguarding matters** that need to be reported to the DSL and the Global DSO, using the process set out in the [TLM Safeguarding Children and Vulnerable Adults Policy and Procedures](#). Examples of when Bullying and Harassment concerns need to be reported to the DSL and the Global DSO include:

- When a child, vulnerable adult, or beneficiary is involved.
- When the concerns relate to Sexual Harassment.
- When the concerns involve a Senior Member of Staff (Senior Leader or Manager, Country Leader or Board Member).
- When the concerns demonstrate poor organisational practices and culture within a TLM member (Including, but not limited to: when misbehaviour involves more than one individual, when misbehaviour is repetitive, when misbehaviour is not acted upon, when misbehaviour is widespread).

- When significant harm may result from the concerns raised.

Confidentiality

All matters relating to complaints of bullying or harassment will be treated in strict confidence. Any breach of confidentiality in this regard may render those responsible liable to disciplinary actions.

It is normally necessary to make the subject of the complaint aware of the allegations against them. They have a right to know the details of the allegations against them, so that they can respond. This normally involves sharing information about the name(s) of those making the allegations, together with the name(s) of any witnesses. To make sure it is safe to reveal this information, each situation will be risk assessed first, before any information is shared with the subject of the complaint.

Monitoring of this policy

The Global Designated Safeguarding Officer, in conjunction with the Global Fellowship Trustee Safeguarding Lead will review this policy from a legal and operational perspective every two years.

This policy will be monitored as part of the monitoring the safeguarding policy. This will be at local Board meetings, at the Global Fellowship Board and through the Member Review process.

Contacts

Position	Contact details
Local Designated Safeguarding Lead	
Country Leader	
Designated Safeguarding Officer	DSO@leprosymission.org
Global Fellowship Trustee Safeguarding Lead	safeguarding@leprosymission.org

Related documents

- [Safeguarding Children and Vulnerable Adults Policy](#)
- [Safeguarding Children and Vulnerable Adults Procedures](#)
- [Safeguarding Code of Conduct](#)
- [Whistleblowing Policy](#)

Document History

First edition: 2008

Last review: February 2021

Next review due: 2023