BRAC Prevention of Workplace Bullying and Violence Policy and Procedure

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1. Introduction

Workplace bullying and violence is a serious threat to the physical safety and mental well-being of employees. Failure to prevent such incidents in the workplace hampers an employee's ability to work safely and productively.

Brac has for over forty years made the safety of the participants of its programs, the safety of the employees of its programs and the safety of the employees of its enterprises of paramount importance in the way it has conducted its (anti-poverty) work.

Brac has safeguarded its people (program participants, employees) in the first place by making their safety a primary consideration already at the level of the design of programs and enterprises. The prevention of sexual harassment, intimidation, violence, bullying, humiliation and discrimination, neglect and exploitation is as far as possible build into the work practices themselves. If the design and its implementation cannot reduce risks sufficiently Brac has installed secondary safeguarding mechanisms, like selecting and training of personnel, supervising and monitoring activities, reporting channels, investigations and punishments.

In the overall safeguarding policy BRAC has described its history in more than forty years of safeguarding practice. BRAC pledges to continue its vigilance. The safeguarding policy also described BRAC's ethos and prevention practice in general.

BRAC is committed to uphold the right to a safe workplace for its employees, programme participants and partners where no one is subjected to any form of harassment, bullying, threats or actual violence.

2. Scope of Policy

This policy should be read and interpreted in line with the overarching Safeguarding Policy. The objective of this policy is to address intimidating, threatening, bullying, humiliating, discriminatory, neglect, exploitation, inappropriate or unwelcome behavior in the workplace. Workplace harassment can be a significant one-time occurrence, repetitive, intimidating, threatening, violent direct or indirect behavior by someone in a position of authority, a group of persons at work, employees against a manager or by employees of the same level.

The inappropriate behavior can be verbal, physical or through electronic communication. The use of electronic communication, including social media in the course of employment, to intimidate or threaten a person also falls under this policy if the behavior arises from employees of BRAC.

If an incident of harassment occurs there may be an intersection of issues which are intentionally duplicated and addressed in other BRAC policies such as; the Code of Conduct, Adult with Special Needs, Whistleblowing and Sexual Harassment Elimination Policy. If a harassment complaint includes elements that are sexual in nature the Sexual Harassment Elimination Policy should be the primary policy and procedure that is followed.

This policy applies to all employees including regular, contractual, project, service, trainee (including apprentices & interns), volunteers, temporary staffs and non-graded staffs and programme participants of BRAC.

3. Definitions

Workplace Harassment
Direct or indirect behavior which can be a significant one-time occurrence, repetitive, pestering, unwelcome, threatening, targeted, belittling and physically and/or emotionally harmful to the person subjected to it

Bullying
Behavior which seeks to belittle, dominate, target or single out someone. The behavior can be indirect, aggressive and/or threatening. The use of electronic communication/social media which is referred to as “Cyber bullying” is also covered under this policy

Violence
The threat of physical assault or direct aggressive unwelcome physical contact in the workplace

The following includes a non-exhaustive list of types of behaviors that may constitute a breach of this policy:

- Threat of physical violence
- Physical assault
- Repetitive targeted behavior that belittles or humiliates someone
- Derogatory comments or behavior

4. Role of Supervisor

A supervisor merely carrying out operational direction, performance management, disciplinary measures or any other acts that are within their employment responsibilities will not simply amount to harassment. To constitute as bullying elements of belittling, singling out, threat or intimidation as described in section 3 should be proven with evidence. Supervisors must follow organization policy, procedures and Code of Conduct (COC). Any unfairness and violation of policy and procedures if investigated and are proven appropriate action will be taken as per organization policy against the supervisor.

This policy extends to behavior which occurs outside the BRAC’s premises, such as at social functions or training events, provided there is a sufficient link with the work of the firm and its employees.

No disciplinary action (except the immediate ones if situation demands) can be taken before proper investigation. Complaints raised will follow the disciplinary procedure according to the BRAC Human Resources Policies and Procedures (HRPP).

5. Reporting

Anyone who is subject to workplace bullying should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. BRAC recognizes that harassment may occur in unequal relationships and that it may not be possible for the victim to inform the alleged harasser. If felt that he/she or someone else has been the recipient of harassment, a complaint should preferably be lodged as soon as such incident takes place.

A Report can be made by a victim, peers, supervisors or witnesses using the methods below:

Complaints are received through letters, phone calls and emails. Report can be lodged immediately through any of the following ways:

Complaints or allegations can be made directly to the **Grievance Unit** via mailing to **hrd.gmt@brac.net** or can dial to **+880-1730346883, +880-1708491000**

For countries other than Bangladesh, complains can be lodged to **voice. Country name@brac.net** (i.e. for **Uganda voice.uganda@brac.net,** for Afghanistan – **voice.afghansitan@brac.net**)

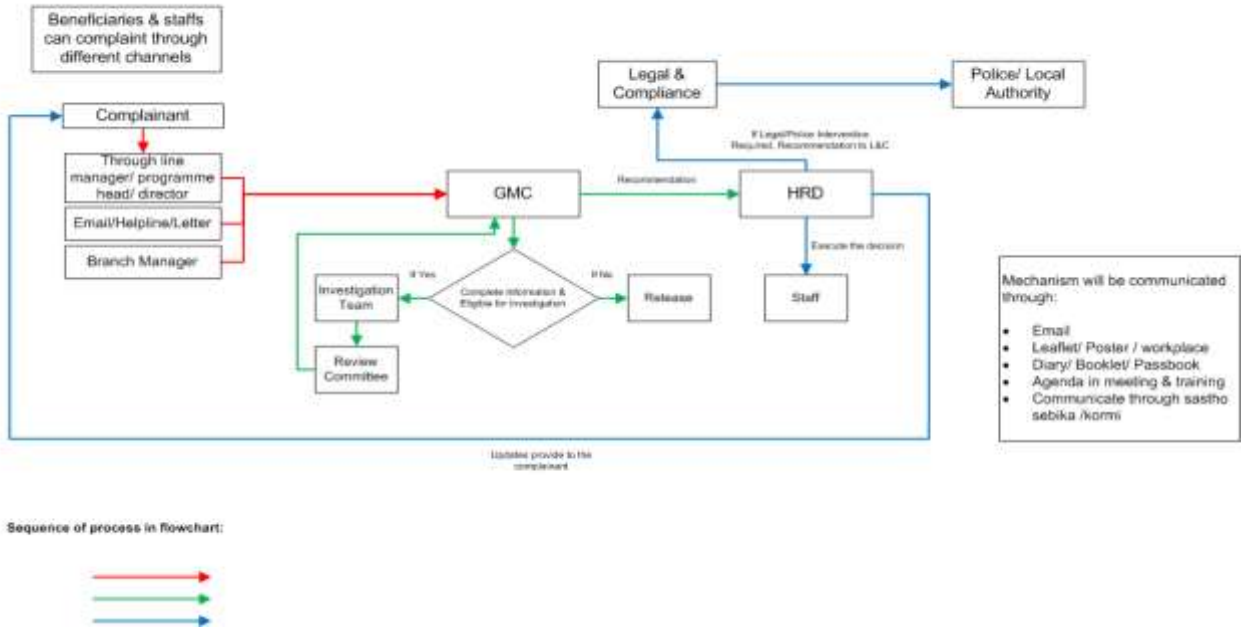
Report can also be lodged directly to Country Representative, Senior Directors, Executive Directors, Chairperson and CPO / Director Human Resources.

If the victim complains via their line management the manager will send the complaint to the Grievance Management Committee who is responsible for reviewing the complaint and deciding whether it warrants investigation. If so, they will refer to the Investigations Unit for investigation.

6. Response

Any complaints related to this policy will address through the grievance procedure. The process is depicted below:

Complaint Mechanism



Grievance Unit:

If the complaint is made through the helpline the Grievance Management Unit attends the call and records the details of the complaint. The Unit is responsible for maintaining records of all complaints, investigation and decisions and preserving all documents and information related to the complaint process. The Unit follows the developed response guidelines which prioritize explaining the strict confidentiality of the process, sensitivity and providing a full overview of the process.

Grievance Management Committee (GMC):

- The Committee will receive all complaints related to “workplace bullying” and “violence”.
- GMC Chair to take urgent decisions for investigation if required.
- Decides on whether the complaint will go for investigation or not.
- If the GMC does not find a prima facie case it will not go for investigation.
- Forward the complaint to investigation team if so decided.
- Ensure that the entire process is done within time
- The Committee will be divided into two sections; a main committee and a sub-committee.
- The main Committee consists of 7 members and the sub-committee consists of 7 members.

Grievance Review Committee (GRC):

- This Committee will consist of three members.
- This Committee reviews the investigation report and gives a recommended decision.
- The review committee gives the Accused an opportunity of hearing.

7. Prevention

- One of main priorities of BRAC is to prevent harassment and uphold a safe working environment. The preventive measures will be:
- Orientation about current Workplace Harassment and Violence policy during every employees onboarding
- Focused training on the victim/survivor centric approach for all staff.
- Refresher training for all employees after certain intervals
- Circulate/display a short version of policy procedures at all locations within BRAC establishment
- Circulate leaflet/Poster/Booklet and include the messages in the staff dairy and beneficiary’s passbook.

8. Review of Policy and Procedure

The policy will be reviewed at a minimum of every two years or when it is shown necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to legislation.