

Discrimination, Bullying & Harassment Policy

Contents of the policy:

Discrimination, Bullying & Harassment Policy	1
Introduction	2
Commitment to safe, equitable and inclusive working environment	2
Scope of policy	2
Responsibilities of the GH5050 Collective	2
Definitions and examples of discrimination, bullying and harassment	3
Definitions of key terms	3
Discrimination	3
Bullying	4
Harassment	4
Sexual harassment	5
Reporting mechanisms and investigation processes	6
Informal reporting	6
Formal reporting	8
Investigation Process	8
Outcomes of the investigation	10
Commitment to transparency	10
Confidentiality & Non-retaliation	10
Prevention measures	11
Implementation	11

1. Introduction

Commitment to safe, equitable and inclusive working environment

Global Health 50/50 (GH5050) is committed to fostering a safe, equitable and inclusive working environment. We aspire to ensure that working with GH5050 is a positive experience for all involved. As such, we do not tolerate any form of discrimination, harassment or bullying among the GH5050 collective and commit to fair and consistent treatment of all members.

Scope of policy

Global Health 50/50 is an initiative housed within University College London (UCL). As such, staff members of UCL who work with GH5050 are covered by the policies of UCL. However, given that the GH5050 Collective extends beyond UCL staff to include volunteers and consultants, this policy is intended to supplement the UCL policy and provide guidance, commitment and procedures on bullying, harassment and discrimination to the entire GH5050 Collective.

This Discrimination, Bullying and Harassment Policy applies equally to all members of the GH5050 collective. The collective includes volunteers, consultants and UCL staff and Co-Directors who work on the GH5050 initiative.

Reports of discrimination, harassment or bullying in the workplace or in connection with GH5050 will be taken very seriously. This policy covers instances of alleged harassment, discrimination or bullying independent of the geographical location of the target and individual engaged in misconduct and irrespective of whether the misconduct occurred in person or in a virtual environment. The responsibilities and protections conferred by the policy apply equally to all members of the collective. Power and seniority do not confer impunity.

Responsibilities of the GH5050 Collective

It is a violation of this policy for any member of the GH5050 collective to attempt to:

- discourage or impede an individual's reporting of harassment, bullying or discrimination or their participation in an investigation process
- knowingly provide false information or interfere with an investigation process.

In this policy the following terms have the following meaning:

- "Target" is the person or persons in the workplace or in connection with work towards whom the conduct constituting possible bullying, discrimination or harassment is directed.
- "Offender / Alleged Offender" is the person or persons in the workplace or in connection with work whose conduct constitutes bullying, discrimination or harassment, if established under applicable policies, or possible bullying, discrimination or harassment.

2. Definitions and examples of discrimination, bullying and harassment

GH5050 recognises that harassment, bullying and discrimination are grounded in power imbalances including, but not limited to, those based on gender, sex, race, sexual orientation, disability, age, gender reassignment, religion or beliefs. GH5050 further recognises that prevention of these forms of abuse requires a redistribution of power to address these entrenched inequalities.

Definitions of key terms

Discrimination

Discrimination involves disadvantage as a result of possessing a protected characteristic, being perceived to possess a protected characteristic, or being associated with someone who possesses a protected characteristic. We are based within the UK and are therefore operating within the parameters of the nine protected characteristics, as defined under the 2010 UK

Equality Act:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

Direct discrimination occurs when someone is disadvantaged on the basis of possessing a protected characteristic, being perceived to possess a protected characteristic, or being associated with someone who possesses a protected characteristic

Indirect discrimination happens when there is a policy that applies in the same way for everybody but disadvantages a group of people who share a protected characteristic, and you are disadvantaged as part of this group. If this happens, the person or organisation applying the policy must show that there is a good reason for it.

Work arrangements in which direct and indirect discrimination can occur include the following areas:

- Dismissal
- Employment, volunteering and partnership terms and conditions
- Pay, stipends and other benefits
- Promotion and access to career opportunities and advancement
- Training opportunities

- Recruitment

Examples of discrimination

- Not selecting a job applicant for a position, even though they are the best candidate, on the basis that they have a disability and may need to take long periods of time off work.
- Failing to make reasonable adjustments such as designating available parking spaces close to the office to disabled employees.
- Paying a woman less than a man for doing a comparable job.
- Requiring all employees to work on Saturdays – even those for whom it is a religious day.
- Forcing a pregnant employee to take a certain amount of time off after giving birth or reassigning the pregnant employee to a less stressful job.

Bullying

Workplace bullying is defined as persistent offensive, intimidating, humiliating behaviour, which attempts to undermine an individual or group of employees.

Examples of bullying behaviour include:

- Ignoring views and opinions
- Withholding information that can affect a worker's performance
- Setting unreasonable or impossible deadlines
- Assigning unmanageable workloads
- Humiliating staff in front of others
- Spreading malicious rumours
- Intentionally blocking promotion or training opportunities
- Ridiculing or demeaning someone by picking on them or setting them up to fail
- Overbearing supervision or other misuse of power or position
- Deliberately undermining a competent worker with constant criticism
- Cyber-bullying using email, text messages, camera phones, social media etc.

Harassment

Harassment is defined in the 2010 UK Equality Act as "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual."

Different types of harassment are set out in the Equality Act as follows:

1. Harassment related to relevant protected characteristics (age, disability, gender reassignment, race, religion or belief, sex, sexual orientation)
2. Sexual harassment - when a person engages in unwanted conduct that is of a sexual nature, whether verbal, non-verbal or physical (see full definition below)

3. Less favourable treatment of a worker because they submit to, or reject, sexual harassment or harassment related to sex or gender reassignment.

Examples include:

- Verbal statements, comments, or jokes referring to a certain ethnic group, race, sex, nationality, age, disability, sexual orientation, religion, or belief
- Physical harassment such as unwelcome touching, assault, blocking, impairing, or otherwise physically interfering with an individual's normal work or movement
- Visual harassment such as derogatory gestures, posters, cartoons, drawings or photographs

Sexual harassment

Sexual harassment is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the target of the conduct shall be considered.

Examples include but are not limited to:

- Attempted or actual sexual assault, including rape
- Sharing or displaying sexually inappropriate images or videos in any format
- Sending sexually suggestive communications in any format
- Sharing sexual or lewd anecdotes or jokes
- Making inappropriate sexual gestures, such as pelvic thrusts
- Unwelcome touching, including pinching, patting, rubbing, or purposefully brushing up against another person
- Staring in a sexually suggestive manner
- Repeatedly asking a person for dates or asking for sex
- Rating a person's sexuality
- Making sexual comments about appearance, clothing, or body parts
- Name-calling or using slurs with a gender/sexual connotation
- Making derogatory or demeaning comments about someone's sexual orientation or gender identity

3. Reporting mechanisms and investigation processes

The following informal and formal reporting options are available to any member of the GH5050 collective and partners who considers that they have been the target of discrimination, harassment or bullying or have witnessed such misconduct. Individuals may choose to proceed with any or all of the below reporting options that they feel comfortable with and are under no requirement to proceed with any or in any particular order.

GH5050 recognises that there can be difficulties in raising the issue of discrimination, harassment and bullying, particularly if:

- the immediate manager is performing the inappropriate behaviour
- the individual feels uncomfortable raising the matter with their manager or feels the manager may lack the skills, knowledge or sensitivity to deal with the complaint
- The individual finds the prospect of using the formal procedure intimidating.

GH5050 is committed to ensuring that such potential difficulties are overcome and that allegations of bullying, discrimination or harassment are raised so that they can be acted upon swiftly and prevented from reoccurring.

The following guidance for informal and formal reporting includes the option of working with an appointed individual responsible for investigating reports and action as a conflict resolution resource. The details of the appointed individual, who will act as the Independent Ethics & Integrity Counselor, are: Ms Emily T Blitz, who can be contacted formally or informally at emily.t.blitz@gmail.com

Informal reporting

1. Early direct action

Targets may on a voluntary basis, if they feel comfortable and safe doing so, approach alleged offenders about inappropriate behaviour and ask for such misconduct to stop as the alleged offenders may not be aware of the negative impact of their behaviour on others. However, disparity in power or status, fear of retaliation or the nature of the behaviour and/or instances of possible harassment, bullying or discrimination may make direct confrontation difficult or inappropriate, and there is therefore no requirement for such action to be taken.

Targets may ask for assistance from Ms Blitz in seeking informal resolution. With the consent of the target, Ms Blitz may meet informally with the alleged offender to provide information about the situation and discuss the manner in which it might be resolved. An unsuccessful attempt to resolve the matter informally does not preclude it from being formally reported.

2. Intervention by core team

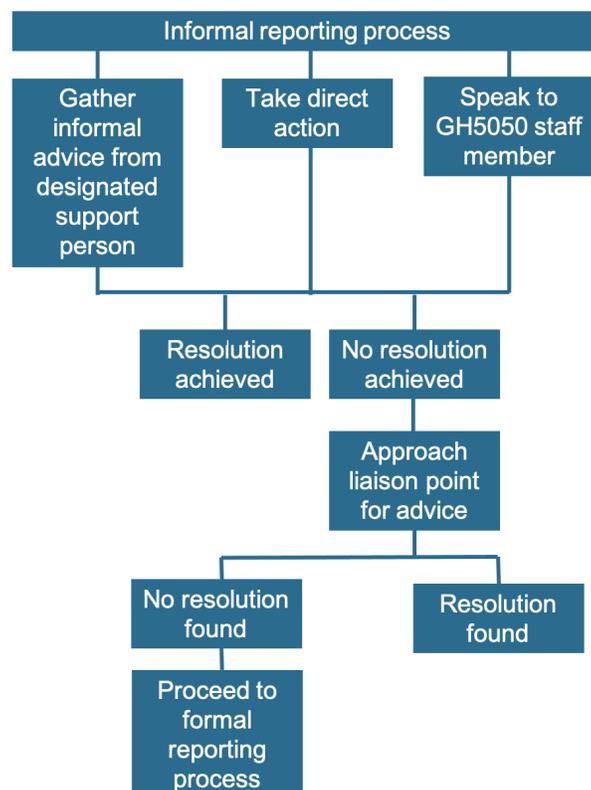
Targets who believe they may have been subject to inappropriate behaviour may raise this with a member of the core GH5050 team (Sonja Tanaka (sonja.tanaka@globalhealth5050.org); Anna Purdie (a.purdie@ucl.ac.uk); Sarah Hawkes (s.hawkes@ucl.ac.uk)). The core team member shall inform the individual that confidential advice, assistance and information about the options available under GH5050's framework to address such possible conduct may be obtained from Ms Blitz.

Core team members will provide advice, assistance and/or information in a timely, sensitive and impartial manner including by providing an opportunity for facilitated discussion about the conduct in question. Any core team member who has been informed about misconduct or instances of possible discrimination, harassment or bullying shall provide support to targets in a sensitive and impartial manner. If a core team member cannot perform this role for any reason, they shall, in consultation with Ms Biltz, refer the colleague to another trusted point of contact within GH5050.

3. Confidential advice

Targets may prefer and are encouraged to discuss their situation informally and confidentially with the designated support person, Ms Blitz, who can assist the targets by explaining the applicable legal framework and the options available under GH5050's policies and practices and indicate resources available for support purposes.

Fig 1. Flowchart outlining the informal reporting process



Formal reporting

Formal reports of possible discrimination, harassment or bullying may be made by persons who consider that they were the target or by persons who have direct knowledge of possible behaviour. Formal reports may be made anonymously and are not subject to deadlines.

A formal report of discrimination, bullying or harassment shall, to the extent possible, describe specific incident(s) in as much detail as possible and be submitted to Ms Blitz (emily.t.blitz@gmail.com). Figure 2 outlines the process for preparing and submitting a formal report.

For example, the report could include the following:

- Name of the alleged offender
- Name of alleged target if the report is made by a third party
- Date(s) and location(s) of incidents
- Description of incident(s)/patterns
- Names of witnesses, if any
- Any other relevant information, including documentary evidence, if available
- Date of the submission of the report and name of person making the report, unless the report is made anonymously.

If the person making the report chooses to report anonymously, the reporter must provide sufficient information concerning the allegations and adequate detail or supporting factual basis that the matter can be pursued responsibly. Should an individual wish to proceed with formal reporting anonymously, they may use the anonymous form for reporting complaints, which can be found [here](#). Link to anonymous reporting form:

https://docs.google.com/forms/d/e/1FAIpQLSdwAXTEvw0DIPY39rMO79t9mEYDa23QcbG8_rf_kAdclVWHw/viewform?usp=sf_link

Investigation Process

Ms Blitz is committed to ensuring that allegations of harassment, bullying and discrimination are investigated in an impartial, thorough and timely manner with any conflicts of interest appropriately addressed; that investigations are conducted with fairness to all parties concerned; and that the rights of all parties are fully protected. Complaints will be handled as confidentially as possible under the circumstances, including the identity of the complainant. Certain allegations may be of such a serious nature that the identity of the complainant cannot be kept confidential.

Ms Blitz will confirm receipt of reports within 3 working days of submission, unless this is reported anonymously in which instance acknowledgement may not be possible. Ms Blitz will promptly assess the report in accordance with this policy to decide if an investigation will be initiated.

If an investigation is initiated, the investigator will update the individual who has submitted the report on the progress of the investigation within two weeks. Once the investigation is complete, the individual who submitted the report and the alleged offender will be informed of the outcome of the report. The provision of such information shall protect the confidentiality of both the target and the alleged offender.

If, following an investigation, GH5050 concludes that there are credible allegations of possible criminal conduct, the case may be referred to national authorities. The individual who has brought the claim forward may also choose to raise it with national authorities, independently of GH5050, at any point in the investigation process.

In the instance that a formal investigation cannot be handled impartially by the designated support point identified in this policy, an additional independent and trained external investigator will be brought in to handle the investigation. The investigation process is outlined below in Figure 3.

Fig 2. Flowchart outlining the formal reporting process

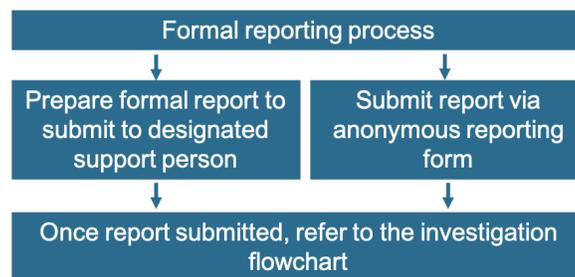


Fig 3. Flowchart outlining the formal investigation process on submission of a formal report



Outcomes of the investigation

Once any investigation has been completed and a decision taken on the outcome, appropriate measures shall be taken. These measures may include:

- Termination or suspension of the accused individuals volunteering or consulting contract with GH5050
- Reassignment of accused individual's roles/responsibilities
- Formal warnings of sanctions that will be made if the accused individual is found to be engaged in misconduct again
- Corrective actions for the accused individual including:
 - Mandatory anti-bullying / harassment / discrimination training
 - Performance improvement plans

Commitment to transparency

GH5050 is committed to transparency in its investigation of allegations of harassment, bullying and discrimination. We commit to annual reporting on the number of reports made, investigations undertaken and whether or not a misconduct was found to have occurred. These annual reports will be shared both with the Collective members, advisory council and trustees and will maintain the privacy of the parties involved in the investigation.

4. Confidentiality & Non-retaliation

Complaints will be handled with a commitment to maintaining confidentiality wherever practicable and will be investigated in a timely manner. Collective members shall be guaranteed a fair and impartial investigation whether they are the target or are under investigation.

Retaliation against an individual for complaining about or assisting in an investigation of discrimination, harassment or bullying through informal or formal channels is prohibited irrespective of the outcome of the investigation.

Retaliation occurs when someone penalises or threatens to penalise another person for their reporting or intention to report suspected harassment, bullying or discrimination or for their involvement in an investigation. Following an investigation, the status of the target of bullying, discrimination or harassment and the alleged offender will be monitored at regular intervals in order to ensure that no party is subjected to retaliation as a consequence of the investigation and its outcome. If retaliation is suspected by any member of the Collective, it should be promptly reported using the mechanisms indicated in section 3 of this policy.

5. Prevention measures

GH5050 will undertake the following measures to prevent discrimination, harassment and bullying in the workplace:

- Competent, respectful management practice including recognition of discrimination, harassment and bullying behaviour and appropriate intervention
- Appropriate circulation of this policy among all members of the collective, and ensuring that all current and new collective members are introduced to the policy and have an opportunity to ask questions or seek clarification about the policy
- All members of the Collective will be asked to participate in regular training sessions (online) on the issues set out in this policy (e.g. prevention of sexual harassment, anti-bullying, etc)
- Providing avenues for collective members to engage in confidential discussion of their situation, seek mediation or take further action at an early stage
- Collection of data on instances of harassment, discrimination and bullying for strengthened monitoring, analysis and prevention
- Regular review of this policy including relevant amendments/additions to more effectively prevent and address instances of discrimination, bullying and harassment

6. Implementation

Ms Emily Blitz is accountable for ensuring implementation of this policy on an ongoing basis including working with core team members of GH5050, where appropriate, to ensure quality investigation and timely outcomes, collect data, monitor the efficacy of the policy and undertake prevention efforts.

This policy will be reviewed periodically with any revisions identified on an as-needed basis but minimally every 3 years.